

# **EXHIBIT A**

<https://www.wsj.com/articles/indicted-florida-pair-known-for-flashy-style-claim-of-trump-ties-11570757074>

## POLITICS

# Indicted Florida Pair Known for Flashy Style, Claim of Trump Ties

Lev Parnas and Igor Fruman made about \$1 million in campaign donations as they attempted deals



A courtroom sketch shows attorney Kevin Downing, left, Lev Parnas, Igor Fruman and attorney Thomas Zehnle at a federal courthouse in Alexandria, Va. PHOTO: DANA VERKOUTEREN/ASSOCIATED PRESS

*By Julie Bykowicz in Washington, Joe Palazzolo in New York and Georgi Kantchev in Kyiv*

Updated Oct. 10, 2019 11:52 pm ET

In Ukraine, they were known by business associates for touting their connections to the Trump administration. In the U.S., their flashy style and propensity for name-dropping raised eyebrows. Their business deals at times ended in lawsuits.

The Soviet-born Florida businessmen Lev Parnas and Igor Fruman—indicted Thursday on campaign finance violation charges that include channeling foreign money into U.S. politics—boasted on social media and to associates about their close ties to American politicians, including President Trump.

Mr. Parnas made his first-ever federal political donation two weeks before the 2016 election, giving about \$100,000 to Mr. Trump and his Republican Party allies, Federal Election

Commission records show. He and Mr. Fruman were the first two in a long line for a photo with the president-elect at a donor thank-you event in Florida a few weeks after he won, according to a person familiar with the event.

Since then, they have sought to expand their political and business portfolios, making about \$1 million in campaign contributions in recent years as they attempted deals in the liquefied-natural-gas market and Nevada's legalized marijuana trade, according to FEC records, interviews and the indictment.

They picked up the pace in the spring of 2018, contributing to federal and local Republican candidates and political-action committees ahead of the midterm elections. Mr. Fruman attended a donor event that March at Mr. Trump's Mar-a-Lago resort and has been photographed with the president, according to Mr. Fruman's social-media postings, which are included in a complaint about the donations filed by the Campaign Legal Center, a nonpartisan activist organization based in Washington.

Some of their biggest contributions are outlined in Thursday's indictment, including a \$325,000 gift in May 2018 to America First Action, the pro-Trump super PAC. Prosecutors say they gave the money through a limited liability company to conceal their identities.

Mr. Trump on Thursday afternoon said of Messrs. Parnas and Fruman: "I don't know those gentlemen."

Messrs. Parnas and Fruman, who were arrested late Wednesday and appeared in federal court on Thursday, couldn't be reached for comment; their attorney, John Dowd, didn't respond to requests for comment.

People in Florida political circles said Mr. Parnas talked up his business deals and connections to politicians. Florida fundraising records show he and Mr. Fruman contributed to two Republican gubernatorial candidates last year, including now-Gov. Ron DeSantis.

In November 2018, they allegedly channeled foreign funds to the Republican candidates for governor and attorney general in Nevada, hoping they could ultimately help the pair obtain a license for a recreational-marijuana business, according to federal prosecutors. Both Republicans lost.

By early this year, Messrs. Parnas and Fruman had struck up a particularly close alliance with Rudy Giuliani, the former New York mayor and one of Mr. Trump's private attorneys.

The three had lunch together at the Trump Hotel in Washington on Wednesday, before the

businessmen were arrested at Dulles Airport in Virginia, with one-way international flight tickets.

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Mr. Parnas made his first known appearance in Mr. Trump’s circle at an exclusive, high-price

October 2016 fundraiser hosted by the construction magnate Robert Pereira at his home in Hillsboro Beach, Fla. Mr. Giuliani attended, and Mr. Pereira remembers Mr. Parnas introducing himself to both Mr. Trump and Mr. Giuliani that evening.

For weeks after the donor event, Mr. Parnas, often joined by Mr. Fruman, pressured Mr. Pereira to invest in an equity insurance company called Fraud Guarantee, Mr. Pereira said.

“He had no real money of his own in it,” Mr. Pereira said. “I didn’t trust this guy and just wanted to get away from him.” He said he cut off contact with Mr. Parnas shortly after that.

Mr. Giuliani said in an interview Thursday that “there is nothing at all incriminating” in the way he met Messrs. Parnas and Fruman.

Mr. Giuliani turned to the two men to find potentially damaging information on the Democratic presidential candidate Joe Biden and chase theories that have been discredited by U.S. intelligence findings about Ukrainian meddling in the 2016 presidential election. They, in turn, solicited money from Ukrainians to help build up their influence in Washington.

In Ukraine, the pair were known for trying to drum up business, touting their connections to Mr. Giuliani and President Trump.

After Volodymyr Zelensky won Ukraine’s presidential election in April, Messrs. Parnas and Fruman sought inroads to the comedian-turned-politician, flying to Israel in April to visit an exiled Ukrainian tycoon close to the president-elect. The tycoon, Ihor Kolomoisky, said he kicked them out of his house after they asked for the meeting to discuss energy deals but then sought an introduction to the newly elected president.

“I said, ‘Maybe I don’t understand something—maybe I stopped by the wrong meeting,’” Mr.





This Facebook screen shot provided by the Campaign Legal Center shows President Trump with Lev Parnas at the White House on May 1, 2018. PHOTO: THE CAMPAIGN LEGAL CENTER/ASSOCIATED PRESS

Kolomoisky said. “I am not going to organize any meeting.” Then he left and told his secretary to escort the men out of the building.

Messrs. Parnas and Fruman, Mr. Kolomoisky said, filed a lawsuit against him, saying he had threatened them in the meeting, a charge he denies. After that meeting, Mr. Giuliani took to Twitter saying Ukrainian President Zelensky “already has surrounded himself with some people that are enemies of Pres. Trump. ”

Mr. Giuliani said Thursday that he continues to represent Messrs. Parnas and Fruman in their legal complaint against Mr. Kolomoisky. He said he also provides them “civil advice on business.”

In July, Mr. Parnas accompanied Mr. Giuliani to a breakfast meeting with Kurt Volker, then the U.S. special representative for Ukraine negotiations. During that breakfast, Mr. Giuliani mentioned the investigations he was pursuing into Mr. Biden and 2016 election interference, according to Mr. Volker’s testimony to House committees.

As they aided Mr. Giuliani’s inquiries, Messrs. Parnas and Fruman sought out business deals. Their company, Global Energy Producers LLC, sought to deliver U.S. natural gas to Ukraine, and they devised a plan to facilitate that by replacing the chief executive of Ukraine’s state gas company, Naftogaz.

At an energy conference in March in Texas, they approached Andrew Favorov, another senior executive at Naftogaz, with a proposal to install him as the head of the company, according to

There is no evidence, however, that Global Energy Producers engaged in any gas deals, according to business associates.

Mr. Parnas, who grew up in Brooklyn's Brighton Beach neighborhood after emigrating from Ukraine in the 1970s, moved to Florida and found investors in the Russian- and Ukrainian-American communities in South Florida.

Mr. Fruman is less well-known, according to the people who encountered them in political circles. Mr. Fruman's export-import company registered with New York in 1996, according to state records. An archived webpage for the company, F.D. Export and Import Corp., says it is a major food distributor in Ukraine. Its products include coffee, chocolate, bananas and jewelry.

Before throwing his efforts into American politics, Mr. Parnas churned through companies and business partners. He has faced lawsuits over unpaid debts and rent, Florida court records show.

In 2007, Peter Murray, a technology executive, joined a company Mr. Parnas created to sell mobile phones. Mr. Murray became Edgetech International Inc.'s president and made a five-figure investment in the company, he said.

On his first day on the job, Mr. Murray learned Edgetech's employees weren't receiving their paychecks. He wrote personal checks to cover them while he waited for funds to arrive. Mr. Parnas told him that his assets had been frozen in a nasty divorce, according to Mr. Murray. He never put together the funding he promised.

Another former business partner, Bruce Galloway, said he formed a company with Mr. Parnas in 2011 to buy distressed companies and turn them around. Mr. Parnas was responsible for raising funds for the venture and touted his connections to Russian money and wealthy individuals, but he failed to deliver, according to Mr. Galloway, who terminated the partnership after only a few months.

Mr. Galloway recalled that Mr. Parnas worked out of a strip mall in Boca Raton but was chauffeured around in a black SUV.

*—Alan Cullison in Kyiv and Alex Leary and Rebecca Ballhaus in Washington contributed to this article.*

## **Corrections & Amplifications**

Lev Parnas and Igor Fruman were arrested Wednesday at Dulles Airport. An earlier version of

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# **EXHIBIT B**



# Inauguration galas, an intimate dinner, and a White House party: Trump's 10 interactions with indicted Giuliani associates

POSTED 2:56 PM, NOVEMBER 12, 2019, BY CNN WIRE



President Donald Trump has had at least 10 encounters with Lev Parnas and Igor Fruman, the indicted associates of Rudy Giuliani the President has adamantly claimed not to know.

Prosecutors allege Parnas and his business partner Fruman illegally funded Republican politicians and campaigns with money from foreign nationals in attempts to buy influence. That pair are also said to have aided Giuliani, the President's personal attorney, in efforts to investigate former Vice President Joe Biden related to Ukraine.

Since their indictment, Trump has stated publicly that he doesn't know Parnas and Fruman.

The interactions, of which many new details are being reported here for the first time, include VIP photos at campaign events, attendance at high-dollar fundraisers and a retreat. They also include a pre-inauguration gala for high-dollar donors, an intimate dinner with the President and photos at the White House Hanukkah dinner with the President, Vice President and Giuliani.

On seven of the occasions, Trump posed for photos with either Fruman or Parnas.



President Donald Trump has had at least 10 encounters with Lev Parnas and Igor Fruman, the indicted associates of Rudy Giuliani the President has adamantly claimed not to know.

The details raise new questions about Parnas and Fruman, including how Parnas gained VIP access to inaugural events and how Fruman was able to take a picture with Trump before a 2016 event with no record of donating to the campaign.

Lawyers for both men either did not respond to CNN's requests or declined to comment. Additionally, both the White House and the Trump campaign did not comment. Rudy Giuliani did not answer questions about his connections to the pair.

"I don't know them," Trump added. "I don't know about them. I don't know what they do but I don't know, maybe they were clients of Rudy. You'd have to ask Rudy, I just don't know."

But a CNN KFile review of photos on social media — including of Parnas' since removed Facebook, photos on his Instagram reported in October by the Wall Street Journal, and other photos and videos splashed across the Internet — paint a far more casual and familiar relationship than the President has let on.

Parnas and Fruman were arrested in October while they were attempting to leave the country. They were indicted on four counts, including conspiracy to violate the ban on foreign donations to federal and state elections, making false statements and falsifying records to the Federal Election Commission. They pleaded not guilty in Manhattan federal court last month to the charges. Parnas and Fruman were ordered to house confinement and were subject to GPS monitoring after they each secured a \$1 million bond.

Two other associates of Parnas and Fruman, David Correia and Andrey Kukushkin, also were indicted on a conspiracy charge. Correia and Kukushkin also have pleaded not guilty.

**Here's a full list of the interactions:**

## **When: March 7, 2014**

Where: Golf tournament at Trump National Doral, Miami, Florida

Who attended: Lev Parnas, Jared Kushner, Ivanka Trump, Donald Trump, Eric Trump, Donald Trump Jr.

Photos posted on social media and Getty Images, first reported by CNN and Politico, show Parnas met Trump at a fashion show hosted by Ivanka Trump for the luxury brand Carolina Herrera during a golf tournament. The event also was attended by Trump's sons Eric and Donald Jr. and Ivanka's husband Jared Kushner, who is now a senior White House adviser. A White House spokesperson for Jared and Ivanka declined to comment on the event last month to CNN.

## **When: Oct. 23, 2015**

Where: Trump campaign rally at Trump National Doral Miami, Florida

Who attended: Parnas, Trump

Photos from Parnas' Instagram show he attended a rally held by Trump at Trump National Doral in Miami. The pictures show Parnas and his son posing with candidate Trump outside of the ballroom where Trump held his rally. Pictures show the pair had passes for the event. Parnas did not return a request for comment and his attorneys declined comment.

## **When: October 2016**

Where: Fundraiser in the home of Robert Pereira in Hillsboro Beach, Florida

Who attended: Parnas, David Correia, Rudy Giuliani, Trump

In October 2016, Parnas and David Correia attended a fundraiser for Trump at the home of businessman Robert Pereira in Hillsboro Beach, Florida. CNN's KFile matched photos from Parnas' Instagram and Correia's Facebook to a fundraiser held in the home of top Trump donor Robert Pereira. The photos from Parnas and Correia's social media show them posing with Trump inside Pereira's home. The Wall Street Journal reported that Rudy Giuliani also attended the event. Parnas and Correia's wife Katie made a \$2,700 donation to Trump's campaign in October 2016.

Correia nor his attorney returned a request for comment. The Trump campaign did not respond to a request for comment. Giuliani did not answer questions about the event.

## **When: Dec. 16, 2016**

Where: Orlando, Florida, Trump "Thank You Tour Rally"

Who attended: Trump, Igor Fruman and Florida campaign workers and VIPs

A photo posted in an interview with Igor Fruman in the outlet Forum Daily shows him posing with Trump on the day of the "Thank You Tour Rally" in Orlando, Florida. The photo has been misreported as having been at Mar-a-Lago in 2018. CNN's KFile identified the photo as being from the rally by cross referencing the picture with other public photos posted on social media by attendees at the event and by speaking to an attendee who confirmed the date and location. Vice President-elect Mike Pence and Rick Scott, then Florida's governor and now a US senator, also attended the photo op before the event.

It is unclear how Fruman, who had not yet donated to the Trump campaign nor his PACs or had any reported record of volunteering for the campaign, attended the event. A lawyer for Fruman declined to comment.

## **When: Jan. 19, 2017**

Where: Pre-inauguration gala at Union Station, Washington, DC

Who attended: Parnas, Trump and hundreds of VIPs including the first family and future White House officials

Parnas stood several feet from Trump at a pre-inauguration gala, according to a series of photos posted on Facebook by donor and radio host John Catsimatidis. Parnas' attendance at the gala was first noted by Politico and was identified by CNN's KFile as the Candlelight Dinner at Union Station. Parnas appears in a group of people standing in the crowded gala near Trump as he speaks to guests. In the photos, Trump can be seen talking to Patriots owner Robert Kraft as Parnas stands near Catsimatidis.

A photo posted on Facebook by Parnas' son Aaron Parnas at a gala that week also shows him posing with Betsy Devos, soon-to-be Education Secretary, at what appears to be a ball on inauguration night. Aaron can also be seen in the ticketed seating area at the inauguration in a CNN photograph.

It is unclear how Parnas attended the Candlelight dinner, tickets of which were given to donors of \$250,000 or more to the president-elect's inaugural committee.

Catsimatidis did not respond to a CNN comment request asking if recalled if he met the President. Parnas' attorney did not respond to questions asking if he met the President.

## **When: March 3, 2018**

Where: Mar-a-Lago resort in Palm Beach, Florida

Who attended: Trump, Fruman

Photos provided by Fruman to several Russian language news websites in 2018 and 2019 show he attended a March 3, 2018 Trump-Pence Victory Reception at Mar-a-Lago. Fruman's photos match other attendees from the event.

Fruman made a \$2,700 donation to the victory fund a little over a week earlier. Fruman reportedly told the outlet Forum Daily he took part in a meeting where Trump met with donors.

Fruman did not return a request for comment. His attorney declined to comment about the event.

## **When: April 30, 2018**

Where: America First Action dinner at the Trump International Hotel, Washington, DC

Who attended: Trump, Parnas, Fruman, Roy Bailey and other donors

Photos show Parnas and Fruman posing with Trump at a private dinner hosted by America First Action SuperPAC weeks before the pair's company Global Energy Producers donated \$325,000 to the super PAC. The venue was previously widely-misreported as the White House, based on Parnas tagging it as such on Facebook. CNN's KFile identified the venue as the Trump Townhouse in the Trump International Hotel through previously posted photos of the venue. The suite boasts an exclusive entrance and a dining room table that fits 16 people and Fruman reportedly told a Russian-language outlet he attended a meeting with Trump and only eight people around the same time.

Trump has previously attended America First dinners and the super PAC has used the Trump appearances at the dinners to court prospective donors.

Kelly Sadler, a spokeswoman for the super PAC, told CNN's KFile in an email, "As has been widely reported, Lev Parnas and Igor Fruman attended America First Action events, including a dinner in April and a leadership summit."

## **When: June 18-19, 2018**

Where: America First Action summit at Trump International Hotel, Washington, DC

Who attended: Trump, Trump Jr., Parnas, Fruman, Correia,

At America First Action's two-day leadership summit in June 2018, Parnas appeared in photos standing next to Trump and near Trump Jr. The photos were posted on Instagram. In another photo, Trump can be seen posing with Correia and Fruman.

## **When: Oct. 20, 2018**

Where: Midterm rally in Elko, Nevada

Who attended: Trump, Parnas, Fruman, Andrey Kukushkin

News footage reviewed by CNN's KFile found Parnas was a VIP attendee at an October 20, 2018, event where he stood behind President Donald Trump. Parnas can be seen behind Trump while he speaks at the rally, and, later, waves to the President as he leaves, and the President waves and gives a fist bump back in the direction of Parnas and the crowd. The rally was also attended by Andrey Kukushkin and Fruman, according to the indictment, but it does not appear they had VIP passes.

A spokesperson for the Trump campaign did not respond to a request for comment if Parnas received a photo with Trump at the event. A lawyer for Parnas declined to comment.

Prosecutors from the Southern District of New York described the October 2018 rally in the 21-page indictment of Parnas, Fruman and their associates Correia and Kukushkin.

# When: Dec. 6, 2018

Where: Hanukkah Party at the White House, Washington, DC

Who attended: Giuliani, Trump, Fruman, Parnas.

Photos, first provided to The Miami Herald in September and also posted on Parnas' Instagram, show Parnas and Fruman attended the White House Hanukkah Party in December 2018. The pair and Giuliani can also be seen in a photo posted on Twitter at the party and later took a photo with Pence, and Trump and Giuliani.

The White House did not comment to CNN, but told the Washington Post last month, which reported their attendance, that the event was attended by hundreds of people.

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# **EXHIBIT C**

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**House Judiciary Committee holds first impeachment hearings**

Lev Parnas lived a checkered life, often working with fraudsters and others tied to organized crime. | Dana Verkouteren/AP Photo

**Giuliani Ukraine associate had checkered past even before indictment**

By **BEN SCHRECKINGER** and **DARREN SAMUELSON** | 10/17/2019 08:57 AM EDT

On Oct. 25, 2008, the owner of a property in Florida in which Lev Parnas had been living told Parnas to leave. When the men began to argue and the owner told Parnas he would call the police, Parnas told the man, "If you call the cops, they are not going to find you ever," according to a petition for a restraining order filed by the landlord in Miami-Dade county court and obtained by POLITICO.

Three days later, the men met to discuss the matter again. According to the petition, Parnas held a gun to the man's head and said, "This is my last warning to you," then got into his car, a dark blue Porsche Cayenne, and drove off. Three days after that, on Halloween, the police seized from Parnas a .38 revolver, a 9mm pistol, an automatic pistol, and a .40-caliber Glock pistol, according to a court motion filed later by Parnas seeking return of the firearms.

The condo at the heart of the dispute was on the 42nd floor of Trump Palace in Sunny Isles Beach, Florida.

Parnas denied threatening his landlord, and the man's petition was dismissed without prejudice for lack of evidence, but the allegations represent just one of several odd links between the man now facing federal criminal charges and the president of the United States — and just one of several disturbing chapters from Parnas's past.

Before he accompanied Rudy Giuliani to the National Cathedral for George H.W. Bush's funeral and posted online about dining at the White House with President Donald Trump, Parnas lived a checkered life, often working with fraudsters and others tied to organized crime. As Parnas and one of his alleged co-conspirators heads to arraignment next Wednesday on charges of manipulating the American political system at the behest of foreigners, the ease with which he was able to buy his way into Trump's inner circle provides an alarming indicator of the integrity of that system.

A lawyer for Parnas, John Dowd, did not respond to a request for comment. On Saturday, Dowd told a POLITICO reporter he was "not going to respond" to any future questions about Parnas, who faces a slew of campaign finance charges. This account was pieced together through interviews, Florida public records, long-forgotten news stories and press releases.

Born in Ukraine in 1972 and raised in Brooklyn, Parnas has told the New Yorker that he worked for a realtor selling units in Trump buildings as a teenager. He's spent his adult life in Florida, where over a 20-year period he provided 21 different business addresses for at

least 16 different ventures. One of them, the PC Edge Foundation, registered to the same Trump Palace address as the episode involving the gun, proclaimed its mission was “to raise funding and awareness to various charity organizations. Our main focus is to eliminate illiteracy.” It was shut down after 17 months.

It was also just one of many obscure forays in Florida business that now are getting a second look as Parnas heads to court on federal criminal charges while also serving as a central figure in the House-led Trump impeachment investigation. In 1999, Parnas appeared in the state’s corporate records listed with a Boca Raton address as a director of Program Trading Corp. Among the other four directors was a Staten Island man, Mitchell Reisman, who remained in business with Parnas through at least 2003. Parnas also named Reisman as a director of one of his own businesses, Aaron Investment Corp. But in 2004, Reisman pleaded guilty in New Jersey to theft by deception and securities fraud for activities that were unrelated to Program Trading Corp. but nonetheless dated to the period of his business partnership with Parnas. Later, Resiman was sentenced to 51 months in prison for another fraud scheme that dated back to 2003 and was prosecuted by the U.S. Attorney’s Office in the Eastern District of New York.

Some of Parnas’s escapades were relatively harmless. In 2002, he was among a group of Miami Heat ticket-holders sued by the basketball team for failing to pay on multiseason, six-figure contracts for premium seats. At the time, Parnas told the Miami Herald he had stopped paying because the team wasn’t living up to its end of an agreement that included a verbal promise to have a player hand him a signed team basketball at center court during halftime of a game in 2000. When that did not happen, Parnas told the paper, “It made me look like a fool in front of my clients.”

Other Parnas ventures had him dealing with associates involved in serious criminal enterprises. By 2006, Parnas was listed in Florida filings as the chairman of Edgetech International. A Nevada-registered corporation that marketed itself as a seller of computer gadgets, Edgetech brought Parnas into business dealings with unsavory characters.

The firm described itself in one press release as selling “the PocketSurfer, a new handheld wireless Web access device” to an international audience from Russia. The company was also promoting a product called “The Edge, the world’s first ultra-mobile handheld computer with a built-in modem operating at DSL type- speed,” which it planned to plug in an appearance at the Sundance film festival in Park City, Utah.

More big announcements kept coming. In September 2006, Edgetech rolled out a partnership with the producer for the pop music band NSYNC, Lou Pearlman, in which a

musician signed to Pearlman's record label inserted lyrics about "The Edge" into a song, which he then performed at the Glass Lounge, "one of the hottest night clubs on South Beach." In a press release, Parnas said, "Pearlman's accomplishments are legendary within the industry, having reached a level of success not often duplicated."

At the time, investigators were closing in on Pearlman for running one of the largest ponzi schemes in history. In February 2007, Florida authorities seized control of some of Pearlman's businesses amid fraud accusations. Four months later, a federal grand jury indicted Pearlman and after his conviction he was sentenced to 25 years in prison. Pearlman died in federal custody in 2016.

In 2008, federal prosecutors in the Eastern District of New York indicted Arthur Dozortsev, his brother Nikolai Dozortsev, and Ricardo Fanchini for their roles in an organized crime enterprise that trafficked in cocaine, heroin and MDMA.

When Nikolai Dozortsev — who has been described by law enforcement as a "high-ranking member of Russian organized crime" — pleaded guilty to some of the counts, he agreed to forfeit a variety of assets. Among them were 100,000 shares of EdgeTech stock registered under the name "Arthur Dozortsen" with an n, and seized from the home of his brother, Arthur, according to court records.

Reached by phone, Arthur Dozortsev said that Parnas had induced him to invest \$20,000 by promising him that the value of EdgeTech stock was guaranteed to rise, but that it ended up being worthless. "He screwed me, bro," Arthur Dozortsev said.

Florida officials in June 2009 revoked Edgetech's license to operate in the state after a Fort Lauderdale lawyer that Parnas had long used as his registered agent resigned the position. The attorney, Jay Valinsky, did not respond to requests for comment.

More ventures followed. In 2010, Parnas solicited a \$350,000 bridge loan from an investor for the financing of a movie, "Anatomy of an Assassin," that never got made, and then failed to pay the money back, according to court records. By 2016, a judge had awarded a \$500,000 judgment against Parnas, which the investor is still trying to collect.

Another Parnas venture — one of several he launched in conjunction with David Correia, an alleged co-conspirator in the campaign finance crimes — was Fraud Guarantee.

According to John Cardillo, a conservative radio host and former New York City police officer who did consulting work for Parnas on the venture, Fraud Guarantee was "originally going to do something with data" but then "morphed into an insurance type play."



It was this entity, Fraud Guarantee, that Giuliani now says retained him for legal advice, for which he told Reuters he received \$500,000, bringing him into association with Parnas.

Cardillo, who said his involvement with the firm was short-lived, said he knew Parnas socially, and viewed him as a sober family man. "He wasn't throwing cash around with women all around him," Cardillo recalled. (That appears to have changed, judging by bank records obtained by Buzzfeed that show Parnas spending lavishly at luxury hotspots and a Kiev strip club.)

Another investor in Fraud Guarantee, who spoke on the condition of anonymity, described Parnas as "a great father," and "not a bad person."

Still, the investor is wondering what happened to their money. "I'm afraid myself," the person said. "I invested money. I never got anything back. And now I'm sitting cold. It's a bit scary. That's it."

Despite this past, when Trump mounted his run for president, Parnas had no problem entering the future president's inner circle. He attended fundraisers for Trump in Florida and the campaign's election night victory party in New York. A photo posted on Facebook days after the January 2017 inauguration by Republican mega-donor John Catsimatidis shows Parnas at a gala in a tuxedo, standing just feet from Trump, Catsimatidis and New England Patriots owner Robert Kraft.

By last year, Parnas and his alleged co-conspirator Igor Fruman were working with Giuliani, who was photographed with Parnas at former President George H.W. Bush's funeral at the National Cathedral in Washington D.C. last December. Jeb Bush told Buzzfeed this week that he thought Giuliani bringing Parnas to his father's funeral was "disappointing." Giuliani did not respond to a question about the invitation.

In a since-deleted Facebook post from last May, Parnas published a photo of himself with Trump, tagging the location as the White House, and captioned it "incredible dinner and even better conversation," according to an investigation published this summer by Buzzfeed and the Organized Crime and Corruption Reporting Project. The White House press office did not respond to a request for comment about the post.

In March, a Jewish group, National Council of Young Israel, honored Parnas and Fruman with a "Lovers of Zion" award at a New York gala attended by House Minority Leader Kevin McCarthy, former Arkansas governor Mike Huckabee, and Giuliani.



At the event, public relations executive Josh Nass spotted the two men behind the scenes in a VIP section, and curious about the unfamiliar faces in the small world of New York's pro-Israel Orthodox event circuit, greeted them in Russian. "These are two typical Brighton Beach thugs," Nass recalled. "That's what they look like. That's what they talk like. I was talking to them in that sort of slang. That's why they liked me."

The conversation did not get very far before Parnas's phone began to ring, and Nass glanced down to see that the caller ID was flashing Giuliani's name. "I was aghast," he said, unable to fathom how the man knew the president's personal lawyer. "You should have seen my face."

*This report first appeared on politico.com on Oct. 17, 2019.*

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# **EXHIBIT D**



## POLITICS

# Trump denies knowing indicted Giuliani associates Lev Parnas and Igor Fruman despite photos

**John Fritze and David Jackson** USA TODAY

Published 5:12 p.m. ET Oct. 10, 2019 | Updated 8:42 p.m. ET Oct. 10, 2019

WASHINGTON – President Donald Trump denied knowing two Ukrainian-born business partners indicted Thursday in connection with alleged schemes to funnel foreign money to U.S. political campaigns, dismissing a photograph that showed him with one of the men at the White House.

“I don’t know those gentlemen,” Trump told reporters on the South Lawn on his way to a campaign rally in Minneapolis.

Prosecutors say Lev Parnas and Igor Fruman helped Trump attorney Rudy Giuliani meet a Ukrainian prosecutor as the former New York mayor pressed for an investigation into Trump’s political rival, Joe Biden. Federal officials said Parnas and Fruman were arrested Wednesday evening at Dulles International Airport near Washington as they prepared to board an international flight with one-way tickets.

Trump brushed aside several photographs of the men with Trump or members of his family. On May 21, 2018, Parnas posted a picture on Facebook of himself with Fruman and Donald Trump Jr. at a breakfast at the Beverly Hills Polo Lounge in California. “Power Breakfast!!!” the caption said. Parnas had previously posted a picture of himself with Trump at the White House on May 1, describing an “incredible dinner and even better conversation.”

**More:** Impeachment: Lawmakers subpoena Giuliani associates Lev Parnas and Igor Fruman, hours after their arrests

“Now it’s possible I have a picture with them because I have a picture with everybody,” Trump said. “Somebody said there may be a picture or something at a fundraiser, or somewhere, but I have pictures with everybody.”

"I don't know them," Trump continued. "I don't know about them, I don't know what they do...Maybe they were clients of Rudy. You'd have to ask Rudy. I just don't know."

Trump's defense came as his campaign has been drawing attention to a photograph of Biden, his son Hunter and a Ukrainian oligarch to question the former vice president's assertion that he never discussed his son's business in Ukraine with him.

House Democrats launched an impeachment inquiry to look into whether Trump improperly used the power of his office to further his own political aims by pushing Ukraine to investigate Biden. During a phone call on July 25 phone call, Trump asked Ukrainian President Volodymyr Zelensky to look into Biden but he has insisted there was nothing improper about the call.

*Contributing: Kevin Johnson*

# **EXHIBIT E**



## Education

# Trump picks billionaire Betsy DeVos, school voucher advocate, as education secretary

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By [Emma Brown](#)

November 23, 2016

Betsy DeVos is hardly a household name, but the Michigan billionaire and conservative activist has quietly helped change the education landscape in many states, spending millions of dollars in a successful push to expand voucher programs that give families taxpayer dollars to pay for private and religious schools.

Now DeVos is poised to spread her preference for vouchers nationwide. President-elect Donald Trump on Wednesday named her as his nominee for education secretary, a pick that suggests he aims to follow through with campaign promises to expand the movement toward “school choice” — including vouchers and charter schools — in an effort to break up a public education system that he has called “a government-run monopoly.”

Trump’s pick has intensified what already was a polarized debate about school choice. Advocates for such choice see in the Trump administration an extraordinary opportunity to advance their cause on a national scale, whereas teachers unions and many Democrats fear an unprecedented and catastrophic attack on public schools, which they see as one of the nation’s bedrock civic institutions.

Jim DeMint, president of the conservative Heritage Foundation, cheered DeVos on Wednesday, saying that “the school choice movement will have a champion in the Education Department.” American Federation of Teachers President Randi Weingarten said that Trump’s pick “makes it loud and clear that his education policy will focus on privatizing, defunding and destroying public education in America.”

As a billionaire Republican power broker with no professional experience in schools, DeVos is an unconventional choice to lead the federal education bureaucracy. And while her views on choice are well known, it is unclear how she would lead a department with responsibilities that sprawl from administering student loans to enforcing civil rights in schools.

She has said little about Common Core, for example, and her ties to organizations that support the K-12 academic standards — including as a board member of the Foundation for Excellence in Education, started by former Florida governor Jeb Bush — raised concern for Trump supporters, who saw her nomination as a sign that the president-elect is wavering on his vehement opposition to the standards.

From her Twitter account Wednesday, DeVos linked to a website where she wrote that she had initially believed in the standards but became disenchanted with them as they “got turned into a federalized boondoggle.”

“I am not a supporter — period,” she wrote.

Many Republicans on Capitol Hill are hoping that DeVos will shrink the Education Department's role in public schools and leave more decisions to states and districts.

"Betsy DeVos is an excellent choice," said Sen. Lamar Alexander (R-Tenn.), chairman of the Senate Health, Education, Labor and Pensions Committee, adding that he expects DeVos to stop the Obama administration's effort to turn the federal government into a "national school board." Alexander led a recent bipartisan effort to pass the Every Student Succeeds Act, which shifted power to the states.

Sen. Patty Murray (D-Wash.), ranking member of the education committee, said she plans to scrutinize DeVos's record and ask her about her qualifications, priorities and plans. Murray also said she would press DeVos to explain — given Trump's statements about immigrants, women, Muslims and other groups — how she "will ensure the safety and respect of all students, of all backgrounds, all across this country."

DeVos, 58, grew up in Michigan, where her father, Edgar Prince, made a fortune supplying auto parts to manufacturers. Her brother is Erik Prince, the founder of Blackwater, one of the most profitable private security firms during the Iraq War. Blackwater came under scrutiny after its guards shot and killed 17 Iraqi civilians in Baghdad in 2007.

She graduated from Calvin College, a Christian liberal arts school in Grand Rapids, Mich., and married Dick DeVos Jr., an heir to the Amway direct-sales fortune. Together, they founded the Windquest Group, which invests in technology and manufacturing.

They wield powerful influence in Michigan, where she is a former chair of the state GOP and he was the Republican nominee for governor in 2006.

They also are major donors to GOP candidates and conservative causes nationwide. During the 2016 cycle, they gave nothing to Democrats and \$2.7 million to Republican candidates and political action committees, according to an analysis by the Center for Responsive Politics. The DeVoses also have donated millions of dollars to the arts and to Christian organizations.

But they are perhaps most ardent about their support for school choice, leading a movement to promote vouchers and charter schools for years.

Betsy DeVos founded and serves as chairman of the American Federation of Children and its associated political arm, a platform she has used to support candidates who endorse vouchers and charter schools and to attack candidates who don't.

Three decades ago, there were no state voucher programs. Now, according to the advocacy group EdChoice, about 400,000 children in 29 states are going to private schools with the help of public dollars.

DeVos is working toward a scenario in which "all parents, regardless of their Zip code, have had the opportunity to choose the best educational setting for their children," she told [Philanthropy](#) magazine in 2013.

Trump has proposed redirecting \$20 billion in federal spending toward a grant program for states to expand vouchers and charter schools. He has also said that he wants to use the bully pulpit of the presidency to persuade states to devote another \$110 billion toward vouchers — enough, he has said, for every child living in poverty to have a scholarship of \$12,000 toward the school of his or her choice.

Research on voucher programs shows mixed results.

Several recent studies have found that voucher recipients' math and reading test scores decline after they transfer from public to private schools. But other studies have found that voucher recipients are more likely to enroll in and complete college.

Public school advocates fear that redirecting dollars from public to private schools not only weakens public education but also gives taxpayer support to institutions that don't have the same obligation to serve all students — including those in need or who have learning disabilities.

Vouchers also send money to religious schools, a fact that has provoked political resistance and legal challenges. "Americans are always free to send their children to private schools and religious schools, but raiding the public treasury to subsidize private businesses and religious organizations runs against the public trust and the Constitution," said Rabbi Jack Moline, president of Interfaith Alliance, adding that Trump's nomination "suggests he has little regard for . . . the constitutional principle of separation of church and state."

But proponents say families should be allowed to choose where their children learn.

"We cannot rest as a nation until every kid gets a chance to attend a great school," Rep. Luke Messer (R-Ind.), chairman of the Congressional School Choice Caucus, said in a statement hailing DeVos's nomination.


Trump's embrace of DeVos shows a willingness to look outside his circle of loyalists. DeVos donated money to Republican primary contenders Bush and Carly Fiorina before throwing her support behind Sen. Marco Rubio (Fla.). She was never an enthusiastic Trump supporter, telling the [Washington Examiner](#) in March that she considered him an "interloper" who "does not represent the Republican Party."

She had warmer words for Trump on Wednesday.

"I am honored to work with the President-elect on his vision to make American education great again. The status quo in ed is not acceptable," DeVos tweeted. "Together, we can work to make transformational change to ensure every student has the opportunity to fulfill his or her highest potential."

 **2920 Comments**

**Emma Brown**

Emma Brown is a reporter on the investigative team who joined The Washington Post in 2009. Previously, she wrote obituaries and covered local and national education. [Follow](#) 

# **EXHIBIT F**

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## The New York Times

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# Trump Picks Elaine Chao for Transportation Secretary

By **Jeremy W. Peters** and **Maggie Haberman**

Nov. 29, 2016

WASHINGTON — She is a woman and an immigrant, a fixture of the Republican establishment for two decades. She is a savvy and professional practitioner of the capital's inside game.

And now she is going to work for President-elect Donald J. Trump.

Mr. Trump named Elaine L. Chao on Tuesday as his choice to be the next secretary of transportation, elevating someone whose background and experience are in many respects completely at odds with the brash and disruptive tenor of his anti-Washington campaign.

But her selection also signaled Mr. Trump's understanding of the need to surround himself with people who can help him accomplish the most ambitious parts of his agenda, even if they come from the political establishment he has so often scorned.

His transportation secretary is likely to be one of the more essential players. Mr. Trump, a real estate magnate, has said that infrastructure redevelopment will be a priority of his first 100 days in office. And Ms. Chao has experience — politically and personally — in navigating the competing centers of power in the capital. She is married to Senator Mitch McConnell, Republican of Kentucky and the majority leader.

This will be her second time serving in a White House cabinet if she is confirmed. As secretary of labor under President George W. Bush, she was the only official in his administration to serve all eight years.

Before that, she worked in various departments across the federal government. She was a White House fellow under President Ronald Reagan and the director of the Peace Corps under President George Bush, who also named her deputy transportation secretary.

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“That says something,” said Richard F. Hohlt, a veteran Republican consultant and friend of Ms. Chao's. “She knows how to work a bureaucracy, and she knows how to last.”

Her résumé speaks to the ease with which she runs in powerful circles in Washington and beyond. She has worked for Harvard's Kennedy School of Government as well as the conservative Heritage Foundation. She was also a frequent commentator on Fox News, a role that several of Mr. Trump's other cabinet picks and candidates share, like K. T. McFarland, whom he named as his deputy national security adviser.

That is not her only connection to the world of Rupert Murdoch, whose News Corporation includes Fox. She sits on the company's board of directors.

She adds some diversity to a cabinet that is so far heavily older, white and male. Ms. Chao, 63, was born in Taiwan and moved to the United States with her family when she was 8.

While the public aspects of her life are well known, Ms. Chao has also played an integral, behind-the-scenes role in her husband's political career, most recently as he fought off efforts to unseat him in 2014. Described by friends and colleagues as unrelenting, she occasionally stepped out into the public eye to take on her husband's antagonists.

Sometimes they also came for her, and she was happy to take them on as well. After a liberal Kentucky group suggested in 2013 that Ms. Chao was somehow connected to the flight of American jobs to China — a jab evidently intended to portray Mr. McConnell as too cozy with American business interests — she starred in a commercial and rushed to his defense. “Far-left special interests are also attacking my ethnicity, even attacking Mitch’s patriotism, because he’s married to me,” she said. “That’s how low some people will stoop.”

Mr. Trump was impressed by her energy and drive, a senior transition official said, speaking anonymously to reveal the private interactions between Ms. Chao and the president-elect. He also admired her no-nonsense attitude, this official said.

But now that she is in line for a prominent position in Mr. Trump’s cabinet, it is her own ties to business that are likely to come under scrutiny. As labor secretary, she faced criticism that her department favored business and was lax on enforcement and worker safety.

At the time, she dismissed those concerns as “partisan.”

Her time out of government service is likely to be the biggest area of focus for labor and other left-leaning interests, though her confirmation in the Senate does not appear to be in any doubt. Senator Chuck Schumer of New York, the Democratic leader, praised her government service on Tuesday, and said he hoped to work collaboratively with her and Mr. Trump on an infrastructure plan, which would have to make it through the Senate her husband leads.

“I hope Secretary Chao shares that ambitious goal and is willing to work with Democrats,” Mr. Schumer said.

A particular area of interest for her critics will be her position on the board of Wells Fargo, which has been tainted by revelations that its managers tolerated and even encouraged its employees to sign customers up for services they did not want.

But other private-sector work could prove to be an asset. She was a banker for Citicorp and helped close transactions that involved transportation financing.

The financing issue she will confront now is altogether different, however. Despite the consensus that the nation’s infrastructure is in dire need of an overhaul, Congress and the White House have been unable to agree on how to pay for it.

“That’s where the creative thinking takes place,” said Ray LaHood, who served as transportation secretary under President Obama. He also worked with Ms. Chao when he served in Congress and she was labor secretary. Given her understanding of the complexities of the private sector and the dysfunction of Washington, Mr. LaHood added, Ms. Chao was a strong candidate.

“I’m as optimistic as I’ve been in a long time about the potential she brings to finally get something done on infrastructure,” he said.



# **EXHIBIT G**



## The **Two-Way**

AMERICA

# Trump Taps Billionaire Investor Wilbur Ross For Commerce Secretary

November 30, 2016 · 7:29 AM ET



JIM ZARROLI



Wilbur Ross, the president-elect's choice for commerce secretary, tips a "Make America Great Again" cap in the lobby of Trump Tower on Tuesday.

*Evan Vucci/AP*

President-elect Donald Trump has chosen Wilbur Ross Jr., a billionaire investor and turnaround specialist, as his commerce secretary.

Ross announced his selection Wednesday during a joint CNBC interview with longtime Wall Street banker Steve Mnuchin, Trump's pick for Treasury secretary.

"Wilbur Ross is a champion of American manufacturing and knows how to help companies succeed," Trump said in a statement announcing his choice.

"Wilbur knows that cutting taxes for working families, reducing burdensome government regulations and unleashing America's energy resources will strengthen our economy at a time when our country needs to see significant growth."

Ross, 79, is a donor and longtime associate of Trump's, having helped him resurrect his casino company after it went bankrupt in the early 1990s.

Over the years, Ross has grown rich by buying troubled companies in industries such as steel, textiles, auto parts and coal and restructuring them, often with significant layoffs and budget cuts. He is said by Forbes to be worth \$2.9 billion, making him the country's 232nd richest person.

In 2002, he cobbled together several troubled steel companies to create the International Steel Group. He later sold the company to Mittal Steel in the Netherlands.

As *The New York Times* reported, "Some businesses where he has invested, like textile mills, have struggled. But other investments have salvaged industry and jobs while providing a lucrative payday."

In 2008, Ross told NPR's Steve Inskeep:

"One of the problems with industries that have been in relatively long-term declines is that very often, the managements in those industries develop a kind of loser mentality. And when you ask them what's wrong with the business, they'll point to extraneous forces.

"It'll be the fault of the unions, or it'll be the fault of China or the fault of the government or the fault of the class-action people. So rather than dealing with the things that may be within their own control, they kind of sit around sulking about things that are fundamentally out of their control."

Ross is the chairman and chief strategy officer, as well as the founder, of the private equity firm WL Ross and Co. He later sold the company to Invesco but is still involved with it.

Among the darker chapters in his career was his involvement with the Sago Mine in West Virginia. Shortly after his company purchased the mine, an explosion there killed 12 miners.

A former Democrat, Ross has been a loyal Trump supporter who shares his skepticism about trade agreements and said in a June interview with CNBC that the U.S. needs a "more radical, new approach to government."

His second of three wives was former New York Lt. Gov. Betsy McCaughey, who authored several articles widely thought to have helped kill off Hillary Clinton's attempt at health care reform in the 1990s.

In Wednesday's statement, Trump also announced that he's selected Chicago Cubs co-owner Todd Ricketts for the job of deputy commerce secretary.

wilbur ross jr   department of commerce   transition   donald trump

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# EXHIBIT H

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## The New York Times

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# Trump Chooses Ben Carson to Lead HUD

By Trip Gabriel

Dec. 5, 2016

Ben Carson, who took Donald J. Trump on a tour of blighted neighborhoods in Detroit during the presidential campaign, including his boyhood home, has been chosen by Mr. Trump to oversee one of the government's main efforts to lift American cities as secretary of the Department of Housing and Urban Development.

Mr. Carson, a retired neurosurgeon, was an early endorser of Mr. Trump after ending his own presidential bid.

"Ben Carson has a brilliant mind and is passionate about strengthening communities and families within those communities," Mr. Trump said in a statement Monday morning. "We have talked at length about my urban renewal agenda and our message of economic revival, very much including our inner cities."

"Ben shares my optimism about the future of our country and is part of ensuring that this is a presidency representing all Americans," he added. "He is a tough competitor and never gives up."

With no experience in government or running a large bureaucracy, Mr. Carson, 65, publicly waffled over whether to join the administration. He will oversee an agency with a \$47 billion budget, bringing to the job a philosophical opposition to government programs that encourage what he calls "dependency" and engage in "social engineering."

He has no expertise in housing policy. Raised by a dauntless mother with a grammar-school education who sometimes turned to the government for food assistance, he stressed in his autobiography that individual effort, not government programs, was the key to overcoming poverty.

The Department of Housing and Urban Development oversees programs that provide vouchers and other rental assistance for five million low-income families, fights urban blight and helps struggling homeowners stave off foreclosures.

Housing policy was rarely mentioned on the campaign trail by candidates in either party. When Mr. Trump spoke of "inner cities," he painted with a broad brush to describe the lives of poor blacks and Hispanics as "a disaster," pleading for their votes by asking, "What do you have to lose?"

In an opinion article in 2015 for The Washington Times, Mr. Carson compared an Obama administration housing regulation to "the failure of school busing" because it would place affordable housing "primarily in wealthier neighborhoods with few current minority residents."

The rule, known as Affirmatively Furthering Fair Housing, was years in the making and designed to end decades-old segregation by offering affluent areas incentives to build affordable housing. Critics, including Mr. Carson, called it government overreach.

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Barbara Sard, a former official at the housing department during President Obama's first term, said Mr. Carson's view was a misunderstanding of the regulation and its origin in the 1968 Fair Housing Act. The rule also included development funds for poor neighborhoods.

"He doesn't seem to understand that extending access to opportunity includes improving conditions in racially concentrated neighborhoods," said Ms. Sard, now vice president for housing policy at the Center on Budget and Policy Priorities.

Mr. Carson will be charged with enforcing the same civil rights law once used in a federal lawsuit against Mr. Trump. He and his father were accused in 1973 of refusing to rent to African-Americans in their buildings. A former Trump superintendent testified that he had been told to mark a "C," for "colored," on the applications of black apartment seekers. The Trumps denied the charges and countersued the government. They ultimately signed a consent decree in which they did not admit guilt, but agreed to desegregate their properties.

In a recent television interview, Mr. Carson said that he was prepared to lead the agency because he grew up "in the inner city" and because as a physician in Baltimore he has "dealt with a lot of patients from that area."

"We cannot have a strong nation if we have weak inner cities," Mr. Carson told Fox News. "We have to get beyond the promises and start really doing something. The amount of corruption and graft and things, shell games that are played — we need to get rid of all that stuff."

Born into poverty, Mr. Carson was awarded a scholarship to Yale, and by age 33 he was named director of pediatric neurosurgery at Johns Hopkins Hospital.

He became an author, a philanthropist supporting scholarships for young students, and a conservative star after attacking Mr. Obama's health care law.

During his campaign, he expressed a sweeping opposition to many government programs devised to end poverty, which he said had replaced church-based and other community initiatives. "We the people have the responsibility to take care of the indigent in our society," he said at a Republican town hall-style event in February. "It's not the government's job."

When he gained on Mr. Trump in polls last year, Mr. Trump attacked his rags-to-riches biography. Mr. Trump ridiculed his rival's account of how he nearly committed a stabbing as a youth, a pivotal moment in Mr. Carson's life story that led to prayer and a calmer temper. "How stupid are the people of the country to believe this crap?" Mr. Trump asked at a rally in Iowa.

But after Mr. Carson dropped out of the race in March, he reconciled with Mr. Trump and became a frequent surrogate on television for him. A key moment of building trust was at a debate in February when Mr. Carson missed his cue to take the stage, and Mr. Trump walked out with him to ease the awkwardness, said Armstrong Williams, a close friend of Mr. Carson's.

"They both have grown," Mr. Williams said. "Dr. Carson has tremendous respect for this man."

"These guys have been friends, like brothers, forever," he added.

Weeks ago, as Mr. Carson seemed reluctant to join the administration, Mr. Williams was quoted as saying his longtime friend did not want to get in over his head.

"Dr. Carson feels he has no government experience; he's never run a federal agency," Mr. Williams told The Hill, which covers the federal government.

Mr. Carson said on Facebook at the time that he had told Mr. Trump that “I preferred to work outside of government as an adviser,” but that if asked, he would serve. He signaled the day before Thanksgiving that he was ready to take on the Department of Housing and Urban Development. The announcement was delayed as Mr. Carson, who once had planned to learn to play the organ in retirement, gave himself several days to mull it over.

GIVE THE TIMES



# **EXHIBIT I**

# The Guardian

Trump's treasury pick says he will target taxes and trade reforms

This article is more than **3 years old**

## Steven Mnuchin nominated for US treasury secretary

**Donald Trump appoints ex-Goldman Sachs banker who says he will oversee 'the largest tax change since Reagan'**

**Rupert Neate and Edward Helmore** *New York*

Wed 30 Nov 2016 11.49 EST

Donald Trump has nominated Steven Mnuchin, a Goldman Sachs banker-turned-Hollywood movie financier with no government experience, as US Treasury secretary.

Mnuchin, a multimillionaire who was dubbed a "foreclosure king" for buying up distressed mortgages and evicting thousands of homeowners during the financial crisis, immediately announced he would oversee "the largest tax change since Reagan" and said his "No 1 priority is tax reform".

As well as cutting personal taxes, Mnuchin said the US corporate tax rate would be reduced from 35% to 15%. "By cutting corporate taxes, we're going to create huge economic growth and we'll have huge personal income," he said in an interview with CNBC. "We're going to get to 15% and bring a lot of cash back into the US."



Steven Mnuchin speaks to reporters at Trump Tower in New York.  
Photograph: Jewel Samad/AFP/Getty Images

Mnuchin said "taxes are way too complicated" and people spend "way too much time worrying about ways to get them lower". He claimed that the proposed tax cuts would allow the US economy to achieve an annual growth rate of 3% to 4%.

Independent experts have said Trump's proposed tax changes will hugely benefit the super-rich, while having little benefit, if any, for up to 8 million of the poorest families in the US.

Trump described Mnuchin as a “world-class financier, banker and businessman” who would have a “key role in developing our plan to build a dynamic, booming economy that will create millions of jobs”.

The appointment of Mnuchin appears to fly in the face of Trump’s campaign message chastising members of the business elite for causing the US’s ills and attacking Hillary Clinton for her close ties to Wall Street.

Mnuchin, 53, will replace the current Treasury secretary, Jack Lew, who spent most of his career in government or academia. Mnuchin will become the first career banker to take on the high-powered post since former Goldman chief executive Hank Paulson was appointed by George W Bush in 2006 and ran the US Treasury during the 2007-08 financial crisis.

He is worth an estimated \$40m (£32m) and was in charge of raising funds for Trump’s successful election campaign. He was selected in preference to contenders including Jeb Hensarling, the chairman of the house financial services committee, Jamie Dimon, the chairman and chief executive of JP Morgan, and David McCormick, the president of asset management company Bridgewater Associates. The appointment must be confirmed by the Senate.

Mnuchin is the second Goldman alumnus appointed to a top position in Trump’s White House. Steve Bannon, the chairman of “alt-right” ( a far-right movement in the US) website Breitbart News, who ran Trump’s campaign, has been named chief strategist. He had previously worked as a mergers and acquisitions banker for Goldman.

During the campaign, Trump launched a TV advert that portrayed the Goldman chairman and chief executive, Lloyd Blankfein, as the personification of the global elite, saying he had “robbed our working class, stripped our country of its wealth and put that money into the pockets of a handful of large corporations and political entities”.

Trump could be about to add a third Goldman banker to his top team, with Gary Cohn, the bank’s president, being reportedly considered for the post of director of the Office of Management and Budget, in which role he would prepare the federal budget.

Cohn, who has long been seen as heir apparent to Blankfein as Goldman CEO, met the president-elect at Trump Tower on Tuesday. Several sources told DC blog Politico that the pair discussed a potential role for Cohn in the administration, including as OMB director.

Adam Hodge, the communications director at the Democratic National Committee, said: “So much for draining the swamp. [Mnuchin] preyed on homeowners struggling during the recession.”

He said Mnuchin’s appointment was “a slap in the face to voters who hoped he [Trump] would shake up Washington”.

Elizabeth Warren, the Massachusetts democratic senator, called Mnuchin “the Forrest Gump of the financial crisis” because he “managed to participate in all the worst practices on Wall Street” during his lengthy career.

“His selection as Treasury secretary should send shivers down the spine of every American who got hit hard by the financial crisis, and is the latest sign that Donald Trump has no intention of

draining the swamp and every intention of running Washington to benefit himself and his rich buddies,” she said.

Mnuchin had been nicknamed the “foreclosure king” after buying up the remains of IndyMac, a California-based mortgage lender that collapsed in 2008, and evicting people who had trouble keeping up with their mortgage repayments. In 2011, Bloomberg said the “notoriously press-shy” Mnuchin was faced with angry homeowners protesting on the lawn of his Bel Air mansion.

The revived bank, which Mnuchin called OneWest Bank, was accused by a judge of engaging in “harsh, repugnant, shocking and repulsive” practices. The Suffolk County judge Jeffrey Spinner ruled in court that OneWest’s conduct was “inequitable, unconscionable, vexatious and opprobrious” for the way it treated a Long Island couple in 2009. Mnuchin went on to sell OneWest last year for more than double what he paid the Federal Deposit Insurance Corporation for the assets in the teeth of the financial crisis.

Trump defended Mnuchin’s track record in distressed debt. “He purchased IndyMac Bank for \$1.6bn and ran it very professionally, selling it for \$3.4bn plus a return of capital,” Trump said. “That’s the kind of people I want in my administration representing our country.”

Mnuchin and his family also pocketed about \$3.2m in profit from money invested with the convicted conman Bernie Madoff. The money was not returned to Madoff’s many destitute victims because the Mnuchin family had withdrawn the funds before Madoff was exposed as running a Ponzi scheme.

Mnuchin’s first job was at Goldman Sachs, where his father, Robert Mnuchin, had worked before changing careers to become an art dealer. The younger Mnuchin worked at Goldman for 17 years, rising to become a partner before leaving to launch film financing company Dune Capital Management, which has invested in several of Rupert Murdoch’s 21st Century Fox blockbusters, including Avatar. Dune Capital is named after beach dunes near his mansion in the Hamptons.

Speaking on Tuesday night, Robert Mnuchin, the founder of the Mnuchin Gallery on the Upper East Side, told the Wall Street Journal: “He’s a person of great integrity. [We] expect he will do a good job in this very exciting and demanding position.” The elder Mnuchin’s collection includes works by Mark Rothko, Willem de Kooning and Jackson Pollock.

Mnuchin, who has three children from a previous marriage, is engaged to the Scottish actor-producer Louise Linton, who has appeared in CSI: NY and Cold Case. Earlier this year, Linton, 34, was accused of having a “white saviour complex” in a memoir about her gap year as an aid worker in Zambia.

Mnuchin was educated at the \$50,000-a-year Riverdale Country school in New York, and Yale University, where his roommate was Edward Lampert, who went on to become the chief executive of the company that owns Sears.

Trump also nominated Wilbur Ross as commerce secretary. The billionaire distressed-asset investor is a vocal Trump supporter, and has called for a “more radical, new approach to government” and an end to free trade deals.

“There’s trade, there’s sensible trade and there’s dumb trade. We’ve been doing a lot of dumb trade,” he has said. “The trouble with regional trade agreements is you get picked apart by the first

country, then you negotiate with the second country and get picked apart, and then go with the third one and get picked apart again.”

Trump said Ross’s role would be “reducing burdensome government regulations and unleashing America’s energy resources will strengthen our economy at a time when our country needs to see significant growth”.

Ross, 79, is chairman and chief strategist of private-equity firm WL Ross & Co, a company known for deals that included combining bankrupt steel producers. Ross has also plunged into holdings of textiles and coal, at one time controlling 1.2bn tons of US coal reserves.

Trump also selected Todd Ricketts, a billionaire and co-owner of the Chicago Cubs, for deputy secretary of commerce. All the positions are subject to review and approval by the US Senate.

## America faces an epic choice...

... in the coming year, and the results will define the country for a generation. These are perilous times. Over the last three years, much of what the Guardian holds dear has been threatened - democracy, civility, truth. This US administration is establishing new norms of behaviour. Anger and cruelty disfigure public discourse and lying is commonplace. Truth is being chased away. But with your help we can continue to put it center stage. It will be defining year and we’re asking for your help as we prepare for 2020.

Rampant disinformation, partisan news sources and social media's tsunami of fake news is no basis on which to inform the American public in 2020. The need for a robust, independent press has never been greater, and with your help we can continue to provide fact-based reporting that offers public scrutiny and oversight. We are also committed to keeping our journalism open and accessible to everyone and with your help we can keep it that way.

*"America is at a tipping point, finely balanced between truth and lies, hope and hate, civility and nastiness. Many vital aspects of American public life are in play - the Supreme Court, abortion rights, climate policy, wealth inequality, Big Tech and much more. The stakes could hardly be higher. As that choice nears, the Guardian, as it has done for 200 years, and with your continued support, will continue to argue for the values we hold dear - facts, science, diversity, equality and fairness." - US editor, John Mulholland*

On the occasion of its 100th birthday in 1921 the editor of the Guardian said, "Perhaps the chief virtue of a newspaper is its independence. It should have a soul of its own." That is more true than ever. Freed from the influence of an owner or shareholders the Guardian's robust independence is our unique driving force and guiding principle.

We also want to say a huge thank you to everyone who has supported the Guardian in 2019. You provide us with the motivation and financial support to keep doing what we do. We hope to surpass our goal by early January. Every contribution, big or small, will help us reach it. **Make a year-end gift from as little as \$1. Thank you.**

# **EXHIBIT J**

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# The New York Times

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## *Sonny Perdue Is Trump's Choice for Agriculture Secretary*

By Julie Hirschfeld Davis and Maggie Haberman

Jan. 18, 2017

WASHINGTON — President-elect Donald J. Trump on Wednesday selected Sonny Perdue, the former governor of Georgia, to be his secretary of agriculture, two senior transition officials said, making his final cabinet selection two days before he is to be sworn in as president.

Mr. Perdue, a onetime veterinarian who was elected in 2003 as Georgia's first Republican governor since Reconstruction, campaigned heavily for Mr. Trump in the final months of the presidential race, although he had initially backed a rival, former Gov. Mike Huckabee of Arkansas.

His selection ensures that Mr. Trump will enter office with a full complement of chosen cabinet officials, although none have been confirmed. Senators are wrangling over how many nominees can be confirmed by the time Mr. Trump is sworn in on Friday, with Republicans insisting on a series of quick votes and Democrats objecting that they have not had adequate time to vet the candidates, many of whom submitted ethics disclosures late.

The two officials confirmed the decision on the condition of anonymity because they were not authorized to comment on it before the formal announcement.

Mr. Perdue has spoken with Mr. Trump in detail about his views on agriculture and trade, including ways to ensure American producers are not placed at a disadvantage in international agreements. In an interview in December, Mr. Perdue said Mr. Trump had quizzed him on what he would do about unfair trade deals. He said the president-elect “believes that we in the U.S. have been sort of patsies over the years in the way we’ve dealt with our foreign competitors and international trade.”

Mr. Perdue, who once ran a grain and fertilizer business, was among the first candidates Mr. Trump interviewed for the post. But the process dragged on for weeks as the president-elect’s team debated whether it would be better off choosing someone from a different part of the country or selecting an ethnic minority to balance out an overwhelmingly white, male and wealthy cabinet.

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Mr. Perdue, though, pitched himself as an asset with the business and governmental experience to be successful in the post. He spent much of his career in the agriculture business before being elected governor, he told Mr. Trump, and returned to the field in 2011 after leaving office.

“Most people focus on the governor term of eight years, but for me, that was an interruption,” Mr. Perdue said in December. Mr. Trump, he said, “wants people who are experts in the field.”



As governor, amid a record-setting drought in Georgia in 2007, Mr. Perdue led several hundred people at the State Capitol in a prayer for rain, asking God to forgive Georgia for being wasteful with its water. He also called for strict water usage restrictions.

Eric Tanenblatt, Mr. Perdue's former chief of staff, called him highly qualified for the post in a statement on Wednesday night.

"As a successful governor, Perdue has the requisite experience to direct a massive bureaucracy of the sort necessary to conduct the department's many programs," Mr. Tanenblatt said. He praised Mr. Perdue's ability to shape agricultural policy and business.

Mr. Perdue, he said, "knows the challenges facing today's farmers."

Environmental activists condemned Mr. Trump's choice, saying that Mr. Perdue had received hundreds of thousands of dollars in federal farm subsidies that help chemical companies and large agriculture conglomerates at the expense of small farmers and the environment.

"It's certainly hard to imagine that a former fertilizer salesman will tackle the unregulated farm pollution that poisons our drinking water, turns Lake Erie green, and fouls the Chesapeake Bay and the Gulf of Mexico," said Scott Faber, senior vice president of government affairs at EWG, an environmental research group.

If confirmed, Mr. Perdue would oversee an agency with a \$150 billion budget. The Agriculture Department is in charge of farm policy and food safety, and it funds food stamps, other nutrition programs and the Forest Service.

A conservative Republican, Mr. Perdue has ties to at least one senator who will vote on his confirmation. Senator David Perdue, Republican of Georgia, is his cousin.

# **EXHIBIT K**

The AP logo consists of the letters "AP" in a bold, black, sans-serif font. The letters are positioned above a thick red horizontal bar.

## Book Trump? Interest groups press case at his properties

By TAMI ABDOLLAH and STEPHEN BRAUN February 22, 2018

WASHINGTON (AP) — Payday lenders got regulators to rethink rules on how closely to vet borrowers. E-cigarette makers got a delay in federal oversight of many vaping products. Candy makers praised a decision to hold off on more stringent labeling standards. And title insurers declared “victory” for getting changes that benefited them in the tax overhaul.

What do all these American special-interest groups have in common? They were among those that booked meetings, retreats and conferences at hotels and golf resorts owned by President Donald Trump.

While it’s impossible to draw a direct link between where groups seeking to influence the Trump administration hold their events and what they received, one thing is certain: Never before in American history have such groups had the opportunity to hold an event at a property owned by the president, paying for event space, rooms and food with money that ultimately heads into the president’s pockets.

An Associated Press analysis of the special interests that visited Trump properties in the first year of his presidency found several instances that at least created the appearance of “pay for play.” And lobbying experts say as long as the president fails to divest from his businesses and can still profit from such bookings, special interests will take full advantage.

“The name of the game is to have your message heard, and frankly, if you’re helping put money in the family pocket, that’s a good way of getting heard. And it’s legal,” said Bob Schneider, a former lobbyist who worked in Washington for 25 years.

“If I were still doing that business, I would run to the Trump Hotel and have every event I could there,” Schneider said, “because I can’t imagine anyone believing that Donald Trump Jr. doesn’t tell his dad what’s going on with the business.”

Before taking office, Trump made a series of promises to draw a “red line” between his businesses and his administration. They included setting up a trust to hold his assets (which he can still access at any time), handing day-to-day management responsibilities to his two oldest sons and hiring an ethics lawyer to vet business deals. He also pledged to always act “beyond reproach” and never give “even the appearance of a conflict.”

In the first year of the Trump presidency, the watchdog group Public Citizen counted at least 19 interest groups that held events at Trump properties, including those representing miners, oil drillers, hedge fund operators, insurers, funeral home directors and commercial real estate investors.

But it's difficult to know exactly how many such meetings were held and how much money those groups spent because, unlike political organizations or campaigns, interest groups are not required to reveal their expenditures at private facilities.

And the Trump Organization declined to even discuss such meetings.

Several special-interest groups contacted by the AP repeatedly said price, location and availability — not trying to influence public policy — were their primary reasons for booking with Trump.

Government ethics watchdogs say that while these actions may be legal, they can cause the public to question some of the Trump administration's decisions.

"There's a pretty big difference from lobbying and giving business to the president, which essentially means actually enriching the president," said Noah Bookbinder, executive director of Citizens for Responsibility and Ethics in Washington.

"When you have these kinds of business relationships, it creates the risk that the president is instead going to be motivated by what's in his financial interest instead of what's in the best interest of the American people."

A look at several special interests that met at Trump properties, their lobbying priorities, and the real-world results:

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## BANKERS

Hedge fund managers, bankers and payday lenders have been opening their wallets at Trump properties.

In March, the Palm Beach Hedge Fund Association, members of an industry that Trump once said were "getting away with murder" with tax breaks, held a meet-and-greet gathering at his Mar-a-Lago club in town.

A few days later, executives from dozens of banks converged for a three-day conference at the Trump National Doral Miami that was sponsored by a trade magazine. Its panel discussions included one titled "The Trump presidency and what it means for banking."

Next up, a payday lending group will be heading to the Doral in April for its annual conference.

Trump administration goals often align with business groups, but those groups have nevertheless notched significant concessions from lawmakers and regulators in recent months.

Federal regulators recently announced they would reconsider rules requiring payday lenders to make sure potential borrowers can pay back loans. And a law passed late last year will make it harder for consumers to join together to sue their banks.

Also, the tax overhaul left open a loophole for hedge fund operators to claim much of their income as “carried interest” taxed at lower rates than ordinary income. But after Senate questioning, Treasury Secretary Steven Mnuchin said last week that he plans to close the loophole.

Money manager Tom Brown, who spoke at the Doral event for bankers, said he didn’t believe attendees saw it as an opportunity to curry favor with the Trump administration.

For its part, the Community Financial Services Association, a payday lending group, said it first held an annual meeting at the Doral 16 years ago and added, “We look forward to returning.” A board member of the Palm Beach hedge fund group, Jonathan Beaton, said it was a just a social club, not a lobbying organization.

“No one is trying to get to Trump or change policy,” he said.

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## VAPING VICTORY

In July, a Washington-based trade association for the vaping and e-cigarette industry held its annual two-day conference at the Trump International Hotel in Washington. The keynote speaker was Sen. Ron Johnson, a Wisconsin Republican who had just written the Food and Drug Administration asking that it rein in a 2016 rule requiring e-cigarette makers get federal approval to sell the products, something the association says stunts innovation and places heavy costs on small businesses.

Ten days later, the FDA announced that, as part of its efforts to strike the “appropriate balance” between regulation and innovation, manufacturers of e-cigarettes and cigars already on the market would have another four years before they would be required to get agency approval. The delay also applies to regulations on flavored vaping products, which studies show to be especially appealing to young people.

Tony Abboud, executive director of the Vapor Technology Association, said in a statement that it was “overly simplistic” to suggest the July event at Trump’s hotel had anything to do with the FDA delay. He said the venue was selected based on budget and proximity to Capitol Hill.

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## SWEET SUCCESS

The lobbying group that represents “Big Candy” interests such as Mars and Hershey’s held two events at Trump properties in the past two years — at the Doral in Miami in March 2017 and in 2016 at the Trump International Hotel in Washington.

The group appears to have found receptive ears in the administration.

In September, FDA Commissioner Scott Gottlieb proposed delaying Obama-era rules that would have imposed new labeling standards on candy. An official at the lobbying group, the National Confectioners Association, wrote Gottlieb a congratulatory letter, saying that the delay to January 2020 would “significantly reduce the burden” on the industry.

Christopher Gindlesperger, a spokesman for the group, said the Miami event was booked in 2014, a year before Trump entered the presidential race, and the Washington event in 2015 before Trump became president. He added the group’s use of Trump properties was based on its event needs only, adding that its choice of venues is “completely unrelated to our advocacy efforts.”

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## TITLE INSURERS

A trade association for the title insurance industry has spent more than half a million dollars each year over a decade lobbying Congress and the White House. But never before has it had the opportunity to host an event at a property owned by a U.S. president.

In October, the American Land Title Association held a three-day annual conference at Trump National Doral Miami, with rooms advertised to members at the rate of \$279 a night.

Two months later, ALTA wrote about a “significant victory” on its blog. The insurers sell more policies when people buy and sell more homes, but the initial versions of both the Senate and House versions of the tax overhaul would have hurt business by forcing home sellers to hold on to properties longer to claim tax-free capital gains on sales.

The final law cut out those restrictions. Meanwhile, Trump said last month that he would look into another priority for the group, loosening rules on consumer lending.

Representatives for ALTA did not respond to multiple requests for comment.

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## TRAIN TRAINING

What do rules about training programs for railroad workers have to do with a dinner of sweet corn bisque, saffron paella and roasted rockfish accompanied by Trump wine from his Virginia vineyard and Trump Signature coffee?

Well, maybe nothing, but it's worth watching.

The backstory is that the National Railroad Construction and Management Association doesn't like a 2008 Transportation Department rule requiring what it considers excessive training for railroad workers. It has spent years trying to repeal it, spending \$120,000 last year alone on lobbying on this issue and others.

The Federal Railroad Administration had been authorized by Congress in 2008 to enact training rules, but a final rule had been repeatedly delayed.

In March 2017, the association held a lavish dinner at the Trump International Hotel Washington down the street from the White House. "I am drinking Trump coffee," enthused one guest, Iowa Republican Sen. Chuck Grassley, who posted a photo of the menu on his Instagram account.

The next day U.S. railroad executives and lobbyists fanned out to Capitol offices for their annual "Railroad Day" lobbying rounds.

In December, the Federal Railroad Administration announced a proposal to delay implementation of its training rules for another year.

The association did not respond to repeated requests for comment.

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#### THE POP-IN

In at least once instance, Trump himself stopped by during a corporation's event at the president's exclusive Mar-a-Lago club.

It came in December during the Christmas party for Oxbow Carbon LLC, a Florida-based energy company owned by William Koch, a longtime dues-paying member of Mar-a-Lago and brother of billionaires and conservative activists Charles and David Koch.

Oxbow's main product, petroleum coke, a fuel used in oil refining and often stored in bulk, could be affected by the Trump administration's push to ease air and water pollution regulations.

Oxbow spokesman Brad Goldstein said no business was discussed during Trump's visit to the party and stressed that Koch has long held events at Trump's club.



“This was an event to reward Oxbow employees and the president was just visiting as he has in the past,” Goldstein said. “It had nothing to do with public policy.”

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This story has been corrected to reflect that the National Confectioners Association has met twice at Trump properties in the past two years, not in the past year. The most recent was March 2017 at the Trump National Doral Miami. The group also did not schedule another event at the Trump Washington hotel in September.

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# **EXHIBIT L**

**The New York Times**

## ***Checking In at Trump Hotels, for Kinship (and Maybe Some Sway)***

To ethics lawyers, the most extraordinary aspect of the daily merging of President Trump's official duties and his commercial interests is that it has now become almost routine.

**By Eric Lipton and Annie Karni**

Published Sept. 7, 2019 Updated Oct. 25, 2019

WASHINGTON — At a table in the lobby bar of the Trump International Hotel this week, the final details of a black-tie, 40th anniversary gala for the Concerned Women for America were being worked out by the conservative group's staff.

There was the contract with the president's hotel to be reviewed. And there was also unfinished business with the White House — logistical issues posed by two guests from the administration, Vice President Mike Pence and Secretary of State Mike Pompeo, and most important, the status of the video message and letter from President Trump himself that the group wanted for the dinner.

"That is the gold standard," said Kenda Bartlett, Concerned Women for America's executive director. "If we can get that, the rest of this is just dressing."

Staying at the Trump hotel or hosting an event in one of its ballrooms is hardly a guarantee of getting something in return from the Trump administration, or even getting on Mr. Trump's personal radar. But many people like Ms. Bartlett have learned that it also does not hurt.

For a group like Concerned Women for America, with its agenda of religious freedom and limiting abortion rights, for a lobbyist looking for a change in some federal regulation, or for a Republican candidate seeking donors, patronizing the hotel or the president's Mar-a-Lago club or another of his properties has become a routine part of doing business in the Trump era. For some of the president's supporters, it is even a way of giving thanks.

"President Trump has really been on the side of the evangelicals and we want to do everything we can to make him successful," said Sharon Bolan Yerby, an evangelical minister from Dallas, who had dinner at the hotel last fall, and then headed over to the White House the next day for a "faith briefing" of religious leaders. "And if that means having dinner or staying in his hotel, we are going to do so."



The bar in the lobby of the Trump International Hotel is frequented by lobbyists, administration officials and donors. The New York Times

To ethics lawyers, the most extraordinary aspect of the daily merging of Mr. Trump's official duties and his commercial interests both in Washington and around the world is that it has now become almost routine.

Since Mr. Trump became president, there have been thousands of visits to his properties, not only by Mr. Trump himself, but by foreign leaders, lobbyists, Republican candidates, members of Congress, cabinet members and others with ties to the president. At least 90 members of Congress, 250 Trump administration officials and more than 110 foreign officials have been spotted at Trump properties since 2017, according to social media posts and counts by various watchdog groups.

"It reflects the normalization of corruption — this is just how business works in Trump's Washington, D.C.," said Robert Weissman, the president of Public Citizen, a nonprofit ethics group. "We have witnessed a stunning degradation of ethical norms."

Federal Election Commission records, meanwhile, show that since January 2017, at least \$5.6 million has been spent at Trump properties by political candidates or party organizations, including by Mr. Trump's own political operation, according to an analysis by Public Citizen.

In the four years before Mr. Trump's bid for president, these same hotels and other venues collected a total of only \$119,000 in federally regulated payments from political groups.

The merging of interests became an issue this week when Mr. Pence, according to his chief of staff, spent two nights at the Trump International Golf Links and Hotel in Ireland at the suggestion of the president — even though he had a series of meetings on the other side of the country, a 181-mile car and helicopter ride away.

### Profiting from the Trump Name

Political spending benefiting Trump-owned businesses surged after Donald J. Trump began his bid for president and has continued since he has been in office. This is just one slice of spending benefiting Trump businesses, as foreign governments, trade associations and religious groups also hold events at Trump venues.

Spending by political candidates, party organizations  
and other federally regulated political groups,  
including the Trump campaign itself, at

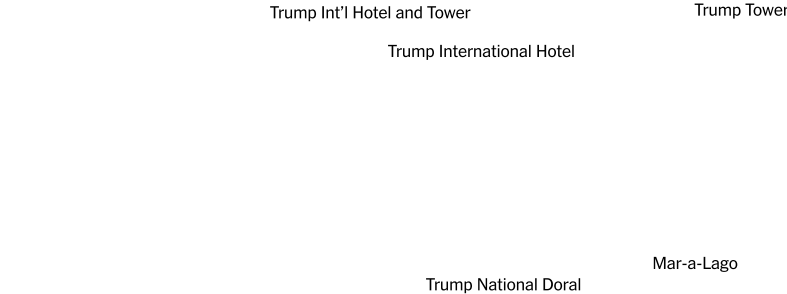
Trump-owned properties and businesses

TOTAL ANNUAL SPENDING  
In thousands

\$49.7	34.0	6.4	29.6	2,554.9	11,091.7	1,201.9	3,207.4	1,150.8
'11	'12	'13	'14	'15	'16	'17	'18	'19 (partial year)

SPENDING BY PROPERTY  
2017- present

= \$1 million



By The New York Times | Source: F.E.C. data, analysis by Public Citizen

The episode took place only a matter of days after Mr. Trump, at the end of the Group of 7 meeting in southern France, suggested he might hold a summit of global leaders next year at the Trump National Doral Miami, one of his Florida resorts.

That prompted congressional Democrats to announce they would begin an investigation into the president’s promotion of his branded properties for government business and the potential abuse of taxpayer funds to enrich the president.

“The committee does not believe that U.S. taxpayer funds should be used to personally enrich President Trump, his family and his companies,” Representative Elijah E. Cummings, Democrat of Maryland and the chairman of the House Committee on Oversight and Reform, wrote in a letter to the White House.

Investigators are also examining the increased use by the Pentagon of an airport in Scotland for refueling stopovers, visits that apparently also included stays by the military crews at the nearby Trump Turnberry golf resort, as first reported by Politico.

But Mr. Trump has simply brushed off the criticism, noting that the business his hotels receive is simply a testament to the quality of the hospitality offered.

“People like my product, what can I tell you?” Mr. Trump said this week. “I can’t help it. But you know. And I guess they say, ‘We want to stay at a place that’s better than someplace else.’”

Omar Navarro, a Republican from California running for the House, has hosted fund-raising events at the Trump National Golf Club in Los Angeles, and more recently set up a series of meetings with donors at the Trump International Hotel in Las Vegas. When he came to Washington this year for the Fourth of July, he stayed at the Trump International Hotel.

“When you have an event there or do something there, it signifies that you are supporting the president, and supporting what he is doing,” Mr. Navarro said. “It sends a clear message.”

Current and former White House officials insist they have never witnessed Mr. Trump making any explicit demand, or suggestion, that his cabinet members or Republican allies stay at a Trump property or use one to host an event. But they have noted that a president who is extremely effective at communicating between the lines does not have to be explicit.

Mr. Trump, they said, spends more time talking about his properties in private than he does in public, and even as president, remains intimately involved with club minutiae, like knowing all the names on his Mar-a-Lago membership roll.

Anthony Scaramucci, for example, the former White House communications director who lasted 11 days in the job, said that “no one pressured” him to stay for as much as \$700 a night at the Trump hotel in Washington, where he lived during part of his short tenure.



But he said there do not need to be any marching orders from Mr. Trump or his inner circle for people to understand the potential benefits of being seen there.

“They’re conforming their behavior to what they think he would like,” Mr. Scaramucci said.

The pattern was set the weekend in January 2017 that Mr. Trump was sworn in and his inauguration committee paid the Trump Organization, the collective name for the president’s businesses, for rooms, meals and event space at the company’s Washington hotel, racking up a bill of \$1.5 million for that event alone. (In this case, corporations and friends and allies of the president covered the cost of the inauguration.)

Various outside groups have at least tried to keep a running tally of all the events since then.

At least 90 members of Congress — including at least 26 of the 53 Republicans in the Senate — have made 188 or more visits to a Trump property, according to a count by Citizens for Responsibility and Ethics in Washington and a newsletter that tracks social media detailing such visits called 1100 Pennsylvania, which is the address of the Trump International Hotel in Washington.

Another 250 Trump administration officials have been seen during at least 630 visits to Trump properties since 2017. And more than 110 officials from nearly 60 different foreign governments have visited a Trump hotel, golf course or other property, according to the count by CREW, as the group is known.

These visits to Trump venues include 24 of the 32 people who have served in Mr. Trump’s cabinet. And that in a way understates the pattern, as a number of these cabinet members have been to Trump properties again and again, like Treasury Secretary Steven Mnuchin, who has been spotted at a Trump-owned venue at least 21 times.

Since he was sworn in, Mr. Trump himself has spent 293 days at one of his family businesses — that is nearly a third of his time in office. These visits have generated hundreds of thousands of dollars in federal government payments to cover the lodging expenses of the Secret Service and other personnel who accompany him.

Mr. Trump’s hotel in Washington — which attracts by far the bulk of the spending by political groups that support the president — is one of the better performing assets in Mr. Trump’s portfolio. Last year, it generated \$40.8 million in revenue, a small increase compared with 2017, even while overall revenue at the company declined.

Some of the biggest chunks in political spending since 2017 are from events held at the Washington hotel and sponsored by the Republican National Committee, as well as Protect the House, a fund-raising committee supporting House Republicans, and America First Action, a super PAC affiliated with Mr. Trump.

Dozens of Republican candidates have held events at other Trump venues in New Jersey, Nevada, California, Florida, Virginia, New York and Illinois.

“If you’re a Republican, it’s a friendly place to go to see a lot of similar-minded people,” said Ari Fleischer, President George W. Bush’s press secretary, who has stayed at multiple Trump properties in Washington, New York City and Chicago.

And sometimes just being there could help.

Judy Shelton, a Trump economic adviser, did a series of interviews from the Trump hotel in Washington, including one in which she suggested holding an international conference of financial leaders at Mr. Trump’s club in Florida. Not long afterward the president announced he intended to nominate her to the Federal Reserve Board.

Kirstjen Nielsen, the former homeland security secretary who never clicked with Mr. Trump, was a regular at a see-and-be-seen table at BLT, the restaurant in the Trump hotel. But it did not stop Mr. Trump from eventually firing her.

Departing White House staff members often choose the Trump International Hotel for their goodbye parties. There is even a monthly happy hour, Trump First Tuesdays, which draws dozens of lobbyists, business executives and political operatives.

The big events drive equally large payments to the Trump family.

The Concerned Women for America’s gala next week, for example, is expected to draw about 500 people to a ballroom dinner. But it will also fill up more than 100 rooms at the hotel that night, and result in countless other dollars spent at the bar, as the group celebrates its Trump-era victories, like the confirmation of Judge Brett M. Kavanaugh to the Supreme Court.

The president’s son Eric Trump said in an interview that the business coming to the Washington hotel and other company properties was not about politics.

“We have the best property in Washington D.C.,” he said on Saturday. “People like the brand.”

Ethics lawyers said that even if the White House and the president were not overtly pressuring individuals seeking help from the federal government to visit a Trump brand, the pattern was still troubling.

“The danger from the beginning was less that the president would press people to stay at his hotel,” said Noah Bookbinder, a former federal prosecutor who is now executive director of CREW. “But people in the administration, congressional allies, industry executives, foreign government leaders — they see that the president reacts favorably to people doing business with him. So they do it.”

The visits that have drawn perhaps the most scrutiny are those by officials of foreign governments. Their frequency has led to allegations that Mr. Trump is violating the so-called emoluments clause of the Constitution by accepting foreign government funds.

The single biggest known tab was paid by the government of Saudi Arabia, which disclosed that it spent \$190,273 at the Trump hotel in early 2017, as well as an additional \$78,204 on catering.

The hotel has on an almost daily basis drawn visits from foreign officials. This week it was Imran Ismail, the governor of a Pakistani province who was in Washington to meet with the State Department and members of Congress to discuss human rights issues in Kashmir, among other topics. The visit was first noticed by Zach Everson, who runs the 1100 Pennsylvania newsletter.

Jose Manuel del Gallego Romualdez, the Philippine ambassador to the United States, explained his own reasoning for scheduling an event at the hotel last year.

“The Trump hotel may have some political undertones because it is associated with the U.S. president,” Mr. Romualdez wrote in a column in a Philippine newspaper. “But since several other embassies have also held their national day celebrations at the Trump hotel, which were well attended — I decided — why not do it there, too.”



# **EXHIBIT M**



(HTTP://WWW.FACEBOOK.COM/CITIZENSFORETHICS)

(HTTP://WWW.TWITTER.COM/CREWCREW)

# TRUMP'S 2,000 CONFLICTS OF INTEREST (AND COUNTING)

## UNPRECEDENTED CONFLICTS OF INTEREST

During his run for president, Donald Trump promised that he would “drain the swamp” in Washington by rooting out corruption and wrenching power from lobbyists and special interests. In the two and a half years since he assumed the office of President of the United States, he has done exactly the opposite: placing former lobbyists in positions of power while giving foreign governments and special interests the opportunity to purchase access to his administration by patronizing his businesses. Instead of limiting Washington corruption, President Trump has pushed it into uncharted territory, innovating forms of corruption.

### BY THE NUMBERS

#### VISITS TO TRUMP PROPERTIES

#### POLITICAL EVENTS AND SPENDING AT TRUMP PROPERTIES

#### BLURRING THE LINE WITH THE WHITE HOUSE

#### INTERNATIONAL TRAVEL AND BUSINESS

Prior to President Trump, every modern president divested their business interests before entering office. For decades, this norm of presidential conduct has served as an important signal for both Republican and Democratic administrations to show that, as the nation's most powerful and prominent public servant, the president would not put personal financial interests before the interests of the country. Divestiture also served as an assurance to the public that the president would not open himself up to undue influence from special interests and foreign governments that might use his businesses as a way to curry favor with him and his administration.

President Trump rejected these principles, and as a result, he has created an environment where the actions of his administration, and those trying to influence it, can benefit the globe-spanning real-estate and branding empire that he still profits from.

The conflicts of interest that President Trump created by retaining his business interests are at some level immeasurable. There is no comprehensive financial filing requirement, for example, that the public or Congress can use to effectively identify these contacts and the administration has refused any good-faith efforts to provide the public with useful information, whether White House visitor logs or the president's tax returns.

But that hasn't kept CREW from relentlessly tracking what information is available through public sources and compiling it in a database of President Trump's conflicts of interest. Since he took office two and a half years ago, CREW has used news reports, social media postings, FOIA responses, a [newsletter \(https://1100pennsylvania.substack.com/\)](https://1100pennsylvania.substack.com/), devoted to monitoring his D.C. hotel, and other information to catalogue every identifiable interaction between the Trump Organization and the government and between the Trump Organization and those trying to influence the Trump administration. Each of those results in a conflict of interest, between the public interest and Donald Trump's personal financial interest.

## TRUMP CONFLICTS OF INTEREST BY THE NUMBERS

CREW has now tallied 2,310 conflicts resulting from President Trump's decision to retain his business interests. Here are some of the most startling numbers from the data:

- The president has visited his properties 362 times at taxpayer expense during his administration, sometimes visiting more than one of them in a single day. In 2019 alone, he has visited his properties 81 times, helping to

(https://www.citizensforethics.org/2000-trump-conflicts-of-interest-counting)

(https://www.citizensforethics.org/2000-trump-conflicts-of-interest-counting-crew) The number of days where President Trump has spent time at a Trump-branded property account for almost a third of the days he's been president.



• One hundred eleven officials from 65 foreign governments, including 57 foreign countries, have made 137 visits to a Trump property, raising the question of how much foreign money has been spent at Trump's properties.

- Additionally, CREW has recorded 630 visits to Trump properties from at least 250 Trump administration officials. This includes high-level White House staff, members of Trump's cabinet, and individual agency employees. So far this year, CREW has recorded 198 visits by White House officials. Ivanka Trump—who has an ownership interest in the Trump hotel in D.C.—and her husband Jared Kushner, both senior White House advisors, are the most frequent executive branch officials to visit Trump properties, other than the president himself. Jared has made 28 known visits, while Ivanka has made 23.
- Members of Congress have flocked to President Trump's properties, despite their constitutional oversight responsibility to provide a check on the executive branch as it relates to President Trump's conflicts of interest. Throughout his two and a half years as president, 90 members of Congress have made 188 visits to a Trump property.
- Forty-seven state officials, including 20 Republican governors, have made 64 visits to Trump properties, sometimes resulting in state taxpayer funds being spent there.
- President Trump has used the presidency to provide free publicity for his properties, which he still profits from as president. Over the course of his presidency, Trump has tweeted about or mentioned one of his properties on 159 occasions, and White House officials have followed suit: Members of Trump's White House have mentioned a Trump property 65 times, sometimes in the course of their official duties.
- Political groups have hosted 63 events at Trump properties since President Trump took office, selling wealthy donors access to the administration while also enriching the president. Seventeen of these have been for Trump-linked groups, and another six have been hosted by groups linked to Vice President Mike Pence. Trump Victory, the joint fundraising arm of Trump's 2020 election committee and the RNC, has hosted six events at Trump properties just this year, four of which were attended by the President himself. In all, the RNC and other Republican Party groups have had 28 events at Trump properties.
- Twenty Trump administration officials have attended 38 political events at a Trump property, giving wealthy donors who fund spending at the president's businesses access to top officials to discuss their pet issues while they enrich President Trump personally.
- Political groups have spent \$5.9 million at Trump properties since President Trump took office. So far this year, political groups have spent \$1.1 million at Trump properties. In more than a decade prior to his run for president, Trump's businesses never received more than \$100,000 from political groups in a single year.
- The Trump Hotel in Washington, D.C. is the top beneficiary of this political spending. In just over two and a half years, the hotel has raked in \$2.4 million in traceable political spending.
- Foreign governments and foreign government-linked organizations have hosted 12 events at Trump properties since the president took office. These events have been attended by at least 19 administration officials.

(https://www.citizensforethics.org/2000-trump-conflicts-of-interest-counting-crew)

(https://www.citizensforresponsibilityandethics.org/)



(https://www.crewwashington.org/2018/)

## VISITS TO TRUMP PROPERTIES

### PRESIDENT TRUMP

Since his inauguration in 2017, President Trump has made 362 visits to his properties, sometimes going to more than one in a single day. In all, he's spent all or part of almost one-third of the days he's been president at one of his properties. Mar-a-Lago tops the list, with 99 visits—followed by Trump Bedminster (84), Trump International Golf Club in West Palm Beach (64), and Trump National Golf Club in Potomac Falls, Virginia (60).

President Trump's visits to his properties often appear to be intended to draw attention to his businesses, rather than a simple personal preference for where to stay or play golf. Not only does he enjoy mingling with paying customers—sometimes **polling** (<https://www.citizensforethics.org/customer-care-at-mar-a-lago-president-trump-consults-members-of-his-elite-club-about-policy-and-staffing/>), them on policy issues or questions about his White House staff—but he has also repeatedly used his businesses for official meetings and campaign events, bringing people to his properties and blurring the lines between his political career and his personal financial interests.

From meeting with executive branch officials and hosting foreign dignitaries to holding press conferences, the president's activities at his properties are often official in nature. This affinity for carrying out executive business at his properties transforms his private clubs, resorts and hotels into centers of power, akin to the White House. For example, in June, President Trump made his first visit as president to Trump National Doral in Miami to celebrate the launch of his 2020 reelection campaign—where, in addition to bringing publicity to the resort, Trump **raised** ([https://www.washingtonpost.com/politics/trump-raised-nearly-25-million-as-he-kicked-off-2020-reelection-rnc-chief-says/2019/06/19/65ebb26a-9291-11e9-b570-6416efdc0803\\_story.html](https://www.washingtonpost.com/politics/trump-raised-nearly-25-million-as-he-kicked-off-2020-reelection-rnc-chief-says/2019/06/19/65ebb26a-9291-11e9-b570-6416efdc0803_story.html)), millions for his political committees.

Last March, Caribbean senior government officials from the Bahamas, the Dominican Republic, Haiti, Jamaica and Saint Lucia paid a **“working visit”** (<https://www.youtube.com/watch?v=2o18oydjgNs>) to Mar-a-Lago to discuss China's “predatory economic practices” and the crisis in Venezuela. In February, President Trump **tweeted** (<https://twitter.com/realdonaldtrump/status/1099803719435239426?s=11>), that he would host China's top leader Xi Jinping for a summit at Mar-a-Lago to discuss trade between the United States and China. When President Trump **announced the resignation** (<https://www.cbsnews.com/news/president-trump-in-florida-today-herbert-hoover-dike-lake-okeechobee-2019-03-29-live-updates/>) of Small Business Administrator Linda McMahon in March, he had reporters meet him at Mar-a-Lago for a news conference that resulted in publicity for the resort.

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(https://www.crews-work.com/2018/)

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(https://www.citizensforethics.org/)



(https://www.citizensforethics.org/2018/08/15/)

## MEMBERS OF CONGRESS

Presented with the unprecedented conflicts of interest posed by President Trump's refusal to divest his business interests, Republican members of Congress have refused to hold him accountable. Rather, they seem to have embraced the arrangement by attending and hosting events and making appearances there, giving Trump's clientele the chance to mingle with powerful people.

At least 90 individual members of Congress have visited Trump properties 188 times. Senator Lindsey Graham's twelve visits to Trump properties make him the most frequent visitor. Most recently, Graham visited (<https://twitter.com/anitakumar01/status/1150135513908699140?s=19>) the Trump National Golf Club in the D.C. suburbs, where

(<https://www.washingtonpost.com/news/energy-environment/wp/2018/07/25/ryan-mcconnell-to-the-white-house-to-talk-govt-funding-with-trump-290620/>), David Perdue (R-GA), and the president himself. Graham is followed by Rand Paul (10), Devin McCarthy (10), Mark Meadows (9), and Lee Zeldin (6) for most frequent visits.



If one member of Congress is spotted at the Trump Hotel, there is a strong chance that others are nearby. As with administration officials, members of Congress frequently attend events together or dine with one another at the president's hotel. For example, earlier this summer, Rand Paul was **honored** ([https://zacheverson.substack.com/p/a-senator-two-reps-and-cindy-yangs?token=eyJ1c2VyX2lkjoxMTUzMTAyLCJwb3N0X2lkjox3MTU5MywiXyI6IjJ5VUVGIlwiaWF0IjoxNTYwMzczNDQ5LCJleHAiOiE1NjAzNzcwNDksInX\\_LZkLTaRyMfUYqFmvTGjG0jLkZV3Fy09\\_YC3hml](https://zacheverson.substack.com/p/a-senator-two-reps-and-cindy-yangs?token=eyJ1c2VyX2lkjoxMTUzMTAyLCJwb3N0X2lkjox3MTU5MywiXyI6IjJ5VUVGIlwiaWF0IjoxNTYwMzczNDQ5LCJleHAiOiE1NjAzNzcwNDksInX_LZkLTaRyMfUYqFmvTGjG0jLkZV3Fy09_YC3hml)) at a gala at the hotel, also featuring Representatives Dan Crenshaw of Texas and Thomas Massie of Kentucky. Last summer, Representatives Ron DeSantis (R-Fla.), Jim Jordan (R-Ohio), and Mark Meadows (R-N.C.), and Senator Lindsey Graham (R-S.C.) attended **judge Jeanine Pirro's** (<https://www.politico.com/newsletters/playbook/2018/07/25/ryan-mcconnell-to-the-white-house-to-talk-govt-funding-with-trump-290620>) book signing at the hotel. In late 2018, Reps. Jim Jordan (R-Ohio), Mark Meadows (R-N.C.) and Raul Labrador (R-Idaho) **dined together** (<https://www.politico.com/newsletters/playbook/2018/11/16/a-way-for-pelosi-to-win-347994>) at BLT Prime, overlooking the hotel lobby.

(<https://www.crewwork.com/2018/>)

Republican members' silence on the matter of Trump's conflicts of interest is particularly striking given that the Trump business they tend to be spotted at the most, the Trump Hotel, just up Pennsylvania Avenue from the Capitol, **is leased to the Trump Organization by the United States government** ([https://www.washingtonpost.com/politics/federal-agency-improperly-ignored-constitutional-concerns-before-allowing-trump-to-lease-building-for-his-hotel-internal-watchdog-says/2019/01/16/9488548a-19cd-11e9-9ebf-c5fed1b7a081\\_story.html](https://www.washingtonpost.com/politics/federal-agency-improperly-ignored-constitutional-concerns-before-allowing-trump-to-lease-building-for-his-hotel-internal-watchdog-says/2019/01/16/9488548a-19cd-11e9-9ebf-c5fed1b7a081_story.html)), meaning that the legal and ethics questions raised by the arrangement fall squarely within the oversight responsibilities of Congress.

## FOREIGN OFFICIALS AND CORPORATE EXECUTIVES

Since President Trump took office, officials from 65 foreign governments, including 57 foreign countries, have visited a Trump property. Altogether, foreign officials account for 137 visits in total, 97 of which have been made to the Trump International Hotel in Washington, D.C.

Many of these visits have come from large events hosted by foreign governments, some of which switched venues to hold annual events at Trump properties after he became president. The embassy of Kuwait had, for example, typically **held** (<https://www.washingtonpost.com/news/digger/wp/2016/12/20/kuwaiti-embassy-is-latest-to-book-trump-d-c-hotel-but-ambassador-says-he-felt-no-pressure/>) its annual national day celebration at the Four Seasons prior to President Trump's election. The **last three years** (<https://www.motherjones.com/politics/2019/01/donald-trump-hotel-kuwait-government-emoluments/>), however, it's held the event at the Trump hotel in D.C. In 2018, the Romanian consulate in Chicago **moved** ([https://www.washingtonpost.com/politics/romanian-consulate-event-at-trump-hotel-in-chicago-draws-scrutiny/2018/12/12/1cef8910-fd68-11e8-862a-b6a6f3ce8199\\_story.html](https://www.washingtonpost.com/politics/romanian-consulate-event-at-trump-hotel-in-chicago-draws-scrutiny/2018/12/12/1cef8910-fd68-11e8-862a-b6a6f3ce8199_story.html)) its own national day celebration to the Trump hotel in Chicago after hosting it at the Chicago Cultural Center five years in a row.

While events like these are likely to be incredibly costly—and thus raise the likelihood of the president financially benefiting from payments made by foreign entities—neither the Trump Organization nor the Trump administration has released the financial details beyond an annual payment to the Treasury the Trump Organization claims represents profits from foreign government funds.

Turkish officials have made 14 visits to Trump properties, more than any other country. This can partially be credited to two **annual conferences on U.S. relations** (<http://atctalkconference.com/>) with Turkey that have been held at President Trump's D.C. hotel. This year, two advisors to President Recep Tayyip Erdoğan and the ministers of trade, defense, and treasury all attended the event.

Other events have drawn officials from countries that span continents or regions. In February, the Embassy of Kuwait in D.C. held a **Kuwaiti independence day** ([https://issuu.com/washdiplomat/docs/final\\_paper\\_april2019](https://issuu.com/washdiplomat/docs/final_paper_april2019)) celebration at the Trump Hotel, with officials from all over the Middle East and North Africa in attendance. The 13 foreign officials in attendance included representatives from Kuwait, Yemen, Saudi Arabia, Oman, Iraq, Sudan, Yemen, and Libya.

Other officials have patronized Trump businesses around the time they met with President Trump. The **Romanian President** ([https://www.washingtonpost.com/graphics/2017/politics/trump-hotel-business/?utm\\_term=.3315e0fa766b](https://www.washingtonpost.com/graphics/2017/politics/trump-hotel-business/?utm_term=.3315e0fa766b)) and **Nigerian Vice President** (<https://zacheverson.substack.com/p/nigerias-vice-president-spotted-at>) both visited the Trump hotel while in D.C. for

([https://www.washingtonpost.com/news/energy-environment/wp/2018/05/01/indonesian-prime-minister-trumps-washington-dc-hotel-2018/?hpid=hp\\_hp-top-table-main-trump%3Aindonesia%3Ahomepage%2Fstory&hpid=hp\\_hp-top-table-main-trump%3Aindonesia%3Ahomepage%2Fstory](https://www.washingtonpost.com/news/energy-environment/wp/2018/05/01/indonesian-prime-minister-trumps-washington-dc-hotel-2018/?hpid=hp_hp-top-table-main-trump%3Aindonesia%3Ahomepage%2Fstory&hpid=hp_hp-top-table-main-trump%3Aindonesia%3Ahomepage%2Fstory)) is known to have stayed there.



f (<http://www.facebook.com/citizensforethics>) **Countries whose officials have visited a Trump business: 57**



([https://www.washingtonpost.com/news/energy-environment/wp/2018/05/01/indonesian-prime-minister-trumps-washington-dc-hotel-2018/?hpid=hp\\_hp-top-table-main-trump%3Aindonesia%3Ahomepage%2Fstory&hpid=hp\\_hp-top-table-main-trump%3Aindonesia%3Ahomepage%2Fstory](https://www.washingtonpost.com/news/energy-environment/wp/2018/05/01/indonesian-prime-minister-trumps-washington-dc-hotel-2018/?hpid=hp_hp-top-table-main-trump%3Aindonesia%3Ahomepage%2Fstory&hpid=hp_hp-top-table-main-trump%3Aindonesia%3Ahomepage%2Fstory))

Corporate executives with business interests before the Trump administration have also made conspicuously frequent trips to stay at his properties. For example, the day after T-Mobile announced a major merger with Sprint, which needed approval from two agencies in the Trump administration, nine executives from the company checked into President Trump's D.C. hotel. They made at least 52 reservations ([https://www.washingtonpost.com/politics/t-mobile-executives-seeking-merger-approval-booked-more-than-52-nights-at-trumps-hotel-more-than-previously-known/2019/02/06/cd6fa7e6-29ca-11e9-b011-d8500644dc98\\_story.html](https://www.washingtonpost.com/politics/t-mobile-executives-seeking-merger-approval-booked-more-than-52-nights-at-trumps-hotel-more-than-previously-known/2019/02/06/cd6fa7e6-29ca-11e9-b011-d8500644dc98_story.html)) at the hotel in the months that followed and paid an additional \$195,000 for "meeting space, catering, business center services, audio/visual equipment rental [and] lodging" according to the Washington Post ([https://www.washingtonpost.com/politics/t-mobile-acknowledges-its-patronage-of-trumps-washington-hotel-increased-sharply-after-announcement-of-merger-with-sprint/2019/03/05/d123be66-3ecb-11e9-922c-64d6b7840b82\\_story.html](https://www.washingtonpost.com/politics/t-mobile-acknowledges-its-patronage-of-trumps-washington-hotel-increased-sharply-after-announcement-of-merger-with-sprint/2019/03/05/d123be66-3ecb-11e9-922c-64d6b7840b82_story.html)).

Meanwhile, in June, a Sprint executive posted a picture on Instagram with President Trump (<https://1100pennsylvania.substack.com/p/sprint-exec-chatted-with-trump-at>) at his private D.C. golf club saying, "Pretty cool when you play golf and then get a minute to chat with POTUS!"

## POLITICAL EVENTS AND SPENDING AT TRUMP PROPERTIES

While Trump's presidency has had a mixed effect ([https://www.washingtonpost.com/politics/trumps-prized-doral-resort-is-in-steep-decline-according-to-company-documents-showing-his-business-problems-are-mounting/2019/05/14/03cc701a-6b54-11e9-be3a-33217240a539\\_story.html](https://www.washingtonpost.com/politics/trumps-prized-doral-resort-is-in-steep-decline-according-to-company-documents-showing-his-business-problems-are-mounting/2019/05/14/03cc701a-6b54-11e9-be3a-33217240a539_story.html)) on the Trump Organization's bottom line, it has unequivocally resulted in an explosion in business from political groups. These groups—aligned with President Trump and Vice President Pence, the campaigns of Republican members of Congress, and corporate PACs—have become some of the Trump Organization's most frequent and highest spending customers.

Since President Trump was inaugurated, political groups have hosted 63 political events at properties he owns and profits from, according to CREW's tracking. These include 17 hosted by the president's own political operation, which includes his campaign, joint fundraising committees that raise money for his campaign, and a super PAC called America First Action that his campaign gave its blessing (<https://www.cnn.com/2019/05/10/politics/trump-2020-and-big-money/index.html>) to, saying that it "is run by allies of the President and is a trusted supporter of President Trump's policies and agendas." An additional six are linked to Vice President Pence.



(https://www.opensecrets.org/trump/trump-properties) self-financing properties as fundraising venues has sent a message to those in his party that he values the promotion of personal income that result from fundraising events. Similarly, the Republican Party's decision to hold events at these properties is in no way an oversight, to say the least. Trump's allies in Congress have used the issue to promote their political agenda, and the Republican Party groups have hosted 28 events at Trump properties, and political committees linked to five Republican members of Congress—who have a constitutional duty to conduct oversight over the president, including his potential conflicts of interest and the lease his D.C. hotel holds with the U.S. government—have hosted an event at a Trump property. Political committees linked to 101 Republican members of Congress have spent money at one.



(https://www.opensecrets.org/trump/trump-properties)

Prior to President Trump's run for president, his properties were not a major destination (https://www.opensecrets.org/trump/trump-properties) for political events. Yet, in the years since, these events and other visits by political groups have exploded, resulting in a windfall for the Trump Organization. President Trump's businesses have raked in almost \$6 million since his inauguration. So far this year, they have been paid \$1.1 million by political groups. Before President Trump ran for president, his businesses were never paid more (https://www.citizensforethics.org/presidential-profiteering-trumps-conflicts-got-worse/) than \$100,000 by political groups in any single year, going back at least as far as 2002.

Since President Trump was inaugurated, political groups have spent more than \$2.4 million at the Trump International Hotel in Washington, D.C., more than at any other property. A CREW report earlier this year found that spending by political groups at the hotel in 2018 accounted for more than three percent (https://www.citizensforethics.org/political-spending-equalled-at-least-3-4-of-revenue-linked-to-trumps-dc-hotel/) of the hotel's revenue that year, to say nothing of the money wealthy donors spend at the hotel while attending these events.

Having events at Trump properties also seems to afford the political groups who host them access to the president and other Republican officials. President Trump himself has attended 21 political events held at these properties, while Vice President Pence has attended another 11. Altogether, 20 Trump administration officials, including President Trump himself, have attended 38 political events at a Trump property, sometimes with multiple officials at one event, giving wealthy donors who fund spending at the president's businesses access to top officials to discuss their pet issues while they enrich President Trump personally.

Trump Victory, which raises money for both the Trump campaign and the RNC, has hosted six events at Trump properties just this year. President Trump has attended four of them. According to the committee's campaign finance reports, it has paid the president's Mar-a-Lago resort and Washington, D.C. hotel more than \$450,000 this year. It has yet to report payments to Trump's Doral or Bedminster resorts this year, where it's also held events that likely resulted in more large payments.

## BLURRING THE LINE BETWEEN THE WHITE HOUSE AND THE TRUMP ORGANIZATION

(https://www.washingtonpost.com/news/energy-environment/wp/2017/01/17/trump-conflicts-of-interest-counting-crews-2018/?hpid=hp\_hp-top-table-main-trump-conflicts-of-interest%3Acounting-crews%3Ahomepage%2Fstory&hpid=hp\_hp-top-table-main-trump-conflicts-of-interest%3Acounting-crews%3Ahomepage%2Fstory) to the effect in January 2017, he pledged, in lieu of divesting his assets, to separate his White House from the Trump Organization, and to non-interact between the two. But that hasn't happened. Instead, Trump and his administration continue to promote Trump's businesses in their official capacities. The Trump Organization regularly releases a list of its properties, and Trump has given his properties a thumbs up on his Twitter account. (https://twitter.com/realDonaldTrump/status/860000000000000000)

The President has already mentioned his properties 55 times this year, and 159 times since becoming president, often straying from the topic at hand to interject references to particular hotels or golf courses into speeches. Other White House officials have followed suit. Former press secretary Sean Spicer mentioned or referred to Trump businesses 14 times, deputy press secretary Hogan Gidley promoted them 12 times, and former press secretary Sarah Sanders promoted them six times.

Besides mentioning his businesses, President Trump and officials in his White House often give them lavish praise, sometimes speaking in their official capacities. While addressing (https://www.youtube.com/watch?time\_continue=670&v=4j75cLnYlwU) the National Association of Realtors meeting in May, President Trump referenced Mar-a-Lago, calling it "a beautiful house." In July, he called his Bedminster resort "a beautiful place" while speaking (https://www.youtube.com/watch?time\_continue=1648&v=WCZRws1Fn\_4) to reporters in the Oval Office. Last November, then-spokesperson for the First Lady Stephanie Grisham, who is now White House Press Secretary, referred (https://www.washingtonpost.com/arts-entertainment/2018/11/26/theres-only-one-trump-building-amid-white-house-holiday-decorations/?utm\_term=.f4a664fc28ab) to the Trump International Hotel and Tower in Chicago, IL, as "an iconic building in the skyline of Chicago." Deputy Press Secretary Hogan Gidley regularly posts photos from Trump properties to social media, often showing glamorous locales or lush golf courses. While at Trump Tower in New York City earlier this summer, Gidley posted (https://www.instagram.com/p/BxkSMI8H1an/), "The now iconic golden escalator at the ever iconic Trump Tower. New York, NY. cc: @realdonaldtrump #whereitalstarted". Gidley has also fawned over Trump resorts in Bedminster (https://www.instagram.com/p/Bk6buEXHvMF/), N.J., and Doonbeg (https://www.instagram.com/p/ByaF284AUSx/), Ireland.

Top Trump administration officials outside of the White House have also joined the chorus of praise for President Trump's businesses. Commerce Secretary Wilbur Ross called the Trump hotel in D.C. "wonderful" (https://www.youtube.com/watch?v=xBw9u-qhHj8&feature=youtu.be&t=8328) while introducing Ivanka Trump at an official Commerce event in June. And in private remarks to a special interest group at the hotel, Interior Secretary David Bernhardt praised (https://www.citizensforethics.org/bernhardt-praised-trump-hotel-mining/) the hotel as "such a nice venue," while serving as the department's Deputy Secretary.

It often seems as if all of Trump's thinking traces back to his businesses. He frequently reaches for a reference to one at unexpected times. While addressing Korean business leaders (https://www.youtube.com/watch?time\_continue=1271&v=Mo6cyU8ycig) in Seoul earlier this year, for example, President Trump expressed his appreciation for his hosts by pointing out that "nine of the top ten finishers" at the U.S. Women's Open, held at his Bedminster, New Jersey golf course in 2017, were Korean. When asked (https://www.youtube.com/watch?v=iyNVczgxlXw&feature=youtu.be&t=310) by a reporter if he still supported the United Kingdom's decision to leave the European Union, President Trump falsely claimed (https://www.huffpost.com/entry/trump-boasts-predicted-brexits\_n\_5b492b34e4b0bc69a7874bee) that he was standing outside of his Turnberry golf course in Scotland the day before the Brexit vote.

President Trump's properties have also referenced their famous owner, and his government position. A brochure (https://www.citizensforethics.org/timeline/112480-2/) for Trump National Golf Club in Bedminster, N.J., which has been discontinued, advertised possible visits from the president: "If he is on-site for your big day, he will likely stop in & congratulate the happy couple," a promise on which President Trump has made good twice this summer alone. Trump Tower Mumbai sent out promotional materials (https://www.citizensforethics.org/timeline/153265-2/) pointing out its affiliation with the "U.S.-based real estate tycoon, celebrity & POTUS Donald Trump." Mar-a-Lago reportedly sold shirts (https://www.citizensforethics.org/timeline/50954-2/) with a "45" detail on the sleeve, referencing Trump's presidency. In August 2018, Trump Bedminster retweeted (https://www.citizensforethics.org/trumps-ethics-promises-have-not-been-kept/) a Fox & Friends video of then-White House Chief of Staff John Kelly that mentions President Trump. This spring, Trump's Doonbeg resort tweeted (https://thehill.com/homenews/administration/447445-trump-property-in-ireland-promotes-presidents-visit) about the president's visit to the property, including a video of him at the resort. It later deleted the tweets.

(https://www.crews-2018.org/)

(<https://www.washingtonpost.com/news/energy-environment/wp/2017/05/11/trumps-2000-conflicts-of-interest-and-counting-CREVA/>)

presidency and the Trump Organization. President Trump has **nominated**

([https://www.usaid.gov/story/2019/02/22/7ec4022a-36f6-11e9-854a-7a14d7fec96a\\_story.html?noredirect=on&utm\\_term=.686e18e8f54b](https://www.usaid.gov/story/2019/02/22/7ec4022a-36f6-11e9-854a-7a14d7fec96a_story.html?noredirect=on&utm_term=.686e18e8f54b))

**f** ([https://www.usaid.gov/story/2019/02/22/7ec4022a-36f6-11e9-854a-7a14d7fec96a\\_story.html?noredirect=on&utm\\_term=.686e18e8f54b](https://www.usaid.gov/story/2019/02/22/7ec4022a-36f6-11e9-854a-7a14d7fec96a_story.html?noredirect=on&utm_term=.686e18e8f54b)) of the Trump Hotel D.C. The two were placed on a "VIP Arrivals" list by Trump Hotel staff and identified as "gold-level members of the Trump Card rewards program."

Others close to the Trump Organization have been offered access to the White House more informally. Last summer, for example, **Buzzfeed reported** (<https://www.buzzfeednews.com/article/tariniparti/trump-air-force-one-mar-a-lago-tour#.xw54MLan08>) that some members of Trump's Florida clubs appear to have been invited to tour Air Force One. Last fall, VP of interior design at the Trump Organization, Giavona Pirolo, received an **"impromptu tour"** ([https://twitter.com/z\\_everson/status/1064192336161165313](https://twitter.com/z_everson/status/1064192336161165313)) of the White House while visiting Washington and staying at Trump's D.C. hotel.

In 2017, President Trump **facilitated** (<https://www.pga.com/news/pga/senior-pga-club-professionals-tour-white-house-guests-president>) a private White House tour for 23 professional golfers who were competing in the KitchenAid Senior PGA Championship, which was held at the Trump National Golf Club in Potomac Falls, Virginia. That same year, Phil Ruffin, co-owner of the Trump International Hotel in Las Vegas, **visited** (<https://www.citizensforethics.org/timeline/53495-2/>) President Trump in Washington, D.C., on what Mr. Ruffin said was "purely a social call." He stayed at the White House.

President Trump has also gone so far as to offer jobs in the government to his club members and employees. In 2017, First Lady Melania Trump **announced** (<https://www.citizensforethics.org/timeline/152343-2/>) that Timothy Harleth, the former director of rooms at the D.C. hotel, was hired for the position of chief usher at the White House. In 2018, Axios **reported** (<https://www.axios.com/exclusive-trump-privately-pushing-personal-pilot-to-run-faa-1519595187-5a735ccc4-63e6-4348-b980-1aadf0b8e80d.html>) that President Trump was privately pushing for his personal pilot, John Dunkin, to be hired as chief of the Federal Aviation Administration. He ultimately decided on another pick, after the position remained open for more than a year and a series of crashes **highlighted a lack of leadership** (<https://www.washingtonpost.com/nation/2019/03/14/trump-wanted-his-personal-pilot-head-faa-critical-job-is-still-vacant-amid-boeing-fallout/>), at the agency.

President Trump has also empowered members of his private Palm Beach club within the government. A **2018 report from ProPublica** (<https://www.propublica.org/article/ike-perlmutter-bruce-moskowitz-marc-sherman-shadow-rulers-of-the-va>) showed that three Mar-a-Lago members, none of whom had any government or military experience, were allowed to steer veterans policies in President Trump's Department of Veterans Affairs for months.

It's therefore no surprise that a prospective nominee to the Federal Reserve Board **repeatedly patronized** (<https://www.citizensforethics.org/trumps-nominee-to-the-federal-reserve-board-is-another-trump-customer/>) the Trump hotel in DC as Trump weighed her nomination. Judy Shelton conducted multiple interviews from the hotel, and even booked a suite there, as reports that she was under consideration swirled. Trump announced his intention to nominate her last month.

Early in Trump's presidency, the president's two sons promised not to have any entanglement with their father's administration. Despite that pledge, Don Jr. in particular seems to have been involved in it. He **reportedly** (<https://www.politico.com/story/2017/03/jason-hairston-interior-donald-trump-jr-236166>), "played a key role" in picking former Interior Secretary Ryan Zinke, then sought to install a personal friend as a liaison to the agency. According to an anonymous official, National Security Council staff were **directed** (<https://apnews.com/21fb6a17a0bb4ec0aa142c752c54e164>), by the West Wing to take a meeting with a Texas hedge fund manager because he was connected to Don Jr. Last year, President Trump told the Daily Caller that he had endorsed Foster Friess in the Wyoming Republican gubernatorial primary at Don Jr.'s **behest** (<https://dailycaller.com/2018/09/04/trump-reveals-who-to-endorse/>): "I was asked to do that, by my son Don, and I did it."

## INTERNATIONAL TRAVEL AND BUSINESSES

(https://www.citizensforethics.org/2000-conflicts-of-interest-counting-CREW) on his international businesses mixing with the presidency or especially problematic because they may indicate U.S. foreign policy. Though none of these properties are not owned by President Trump, they still result in income for the president through various means. There is a danger that foreign governments would seek to influence the news broadcast (HTTP://businessofpresident.com/trumps-properties) in which he and his wife consider those who are his business partners for official positions.

Indeed, these are all things that have happened. A construction company which both the South Korean and Saudi Arabian governments have interests in is **building** (<https://www.citizensforethics.org/trump-organization-business-partner-signed-a-deal-with-saudi-backed-fund-weeks-before-journalist-disappeared/>) a development in Indonesia that includes a Trump-branded resort, and, in Dubai, a Chinese-government owned firm was **hired** (<https://www.mcclatchydc.com/news/politics-government/white-house/article213164779.html>) to work on a development that will include a Trump-branded golf course. In Panama, the federal government **intervened** (<https://www.mcclatchydc.com/news/nation-world/article192131074.html>) on an infrastructure project that would help a Trump-branded development there after the company contracted for the work went bankrupt, and foreign governments have approved dozens of trademarks for President Trump.

The president of Indonesia is reportedly **considering** (<https://www.citizensforethics.org/indonesia-trump-business-partner-mnc-hary-tanoe/>) the daughter of one of President Trump's business partners for a cabinet-level position, and **several** (<https://www.usatoday.com/pages/interactives/trumps-10-foreign-deals-with-close-to-power/>) of his other foreign business partners have close ties to foreign governments. Donald Trump Jr. visited Indonesia this month to meet with the Trump Organization's business partners and attend a private event to promote the sale of units in the two Trump-brand luxury resorts currently being built there.

By attending foreign government events at Trump properties, the Trump administration has seemed to condone the patronage the president is receiving from them. Foreign governments and foreign government-linked groups have hosted 12 events at Trump properties since the president took office. These events have been attended by at least 19 administration officials. Earlier this year, the Kuwaiti embassy hosted its National Day at the Trump hotel in Washington, the third year in a row that it's done so. The president's repeat customers were rewarded for their loyalty with access to top-level administration officials: Secretary of Commerce Wilbur Ross, Secretary of Housing and Urban Development Ben Carson, EPA Administrator Andrew Wheeler, and Counselor to the President Kellyanne Conway all **attended** (<https://www.kuwaitembassy.us/in-the-news/kuwait-embassy-in-washington-marks-natl-celebrations#slideshow-2>) the event.

Eliminating any doubt that the president has any objection to the appearance issues when foreign officials visit his businesses, President Trump has **suggested** ([https://www.washingtonpost.com/politics/when-trump-visits-his-clubs-government-agencies-and-republicans-pay-to-be-where-he-is/2019/06/20/a4c13c36-8ed0-11e9-adf3-f70f78c156e8\\_story.html?utm\\_term=.a39994fa6da3](https://www.washingtonpost.com/politics/when-trump-visits-his-clubs-government-agencies-and-republicans-pay-to-be-where-he-is/2019/06/20/a4c13c36-8ed0-11e9-adf3-f70f78c156e8_story.html?utm_term=.a39994fa6da3)) that next year's G7 meeting, which will be hosted by the United States, be held at Trump National Doral or another one of his properties. Since then, Doral has **become a finalist** (<https://www.axios.com/trump-national-doral-g7-site-2020-252ae9ee-aafc-444a-a8e7-fa041a30f0aa.html>) in the search for a location.

Prior to entering office, President Trump pledged that the Trump Organization would engage in "no new foreign deals" while he served as president. Yet, a "Corporate Update" **presentation** (<https://www.citizensforethics.org/trump-organization-global-expansion-mnc-group/>) created by one of President Trump's international business partners earlier this year raises questions about whether the Trump Organization is adhering to this promise. It included a slide that said an "Aggressive global expansion" of the "Trump International Portfolio" was "underway," and that, in addition to the Trump Organization's "Presence in six countries" there were "Numerous projects in the pipeline."

While that slide may not be accurate as to the Trump Organization's current activity, in January, Trump Organization Executive Vice President Eric Trump **told** (<https://www.infobae.com/america/mundo/2019/01/09/eric-trump-en-punta-del-este-en-venezuela-y-en-cuba-no-están-dadas-las-condiciones-para-invertir/>) an Argentinian news site that the Trump Organization gets offers for new foreign developments every day and confirmed the Trump Organization plans to consider new international developments when Trump is out of office.



(https://www.crews.org/2018/)



(https://www.washingtonpost.com/news/energy-environment/wp/2017/06/01/trumps-2000-conflicts-of-interest-and-counting-crews/)

President Trump's trip to Ireland was his first foreign trip as president. His two-night stay at Trump International Golf Links in Ireland in this year in particular seemed to double as a business trip. For one, it took him well out of the way of his diplomatic mission. As he arrived at his resort, the president visited (http://www.citizensforethics.org/irish-resort-trump-doonbeg-visit/) the resort's managing director. While in Ireland, Trump discussed (https://www.citizensforethics.org/irish-resort-trump-doonbeg-visit/) his property with an Irish official who represents the county where Doonbeg is located. They "talked about the important role that the resort in Doonbeg plays in local economy," according to the official. Perhaps most suggestive of the nature of the visit, however, is that it resulted in an enormous boost (https://www.independent.ie/irish-news/presidents-visit-delivers-massive-bookings-boost-for-tourism-in-doonbeg-38215276.html) to the business: Bookings at the golf resort reportedly went up by 30 percent right after the visit.

## CONCLUSION

CREW's monitoring has identified well over 2,000 conflicts of interest arising from the President's failure to adhere to the ethics standards of his predecessors in divesting from their private building holdings while in office. That's an unacceptably high number, but it's also likely the tip of the iceberg; there are certainly more conflicts than those we are able to identify. President Trump's conflicts of interest validate entirely CREW's and others' concerns about President Trump retaining his financial interests while in office. Not only is the president continuing to profit from his vast business interests while in office, he appears to be using the presidency to try to enrich himself.

The relentless promotion of Trump businesses from the president and members of his administration has sent a message to those seeking political influence that patronizing his businesses is a way to appeal to the president.

The corrupt relationship between the Trump Organization and the White House calls into question President Trump's decision-making as president. When his personal financial interests diverge from America's national ones, which does he prioritize? That's not a question we should have to ask.

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